

**104(e) Response**  
Portland General Electric – Willbridge (April 30, 2009)

EPA Question	Response	Records/Information Available
<b>Section 1.0 - Respondent Information</b>		
1. Provide the full legal, registered name and mailing address of Respondent.	Portland General Electric Company 121 SW Salmon Street Portland, OR 97204	
2. For each person answering these questions on behalf of Respondent, provide:		
<b>Site Operator: Portland General Electric</b>		
a. full name;	Arya Behbehani-Divers	
b. title;	Manager, Environmental Services	
c. business address; and	121 SW Salmon Street m/s 3WTCBR05 Portland, OR 97204	
d. business telephone number, electronic mail address, and FAX machine number.	Business Telephone Number: 503-464-8141 Electronic Mail Address: Arya.Behbehani-Divers@pgn.com Fax Number: 503-464-8527	
<b>Site Consultant: URS Corporation</b>		
a. full name;	Laura McWilliams, PhD, LG and Heather Patterson	
b. title;	Senior Geologist; Environmental Scientist & Risk Assessor	
c. business address; and	111 SW Columbia, Suite 1500 Portland, OR 97225-5850	
d. business telephone number, electronic mail address, and FAX machine number.	Business Telephone Number: 503-222-7200 Electronic Mail Addresses: Laura_Mcwilliams@urscorp.com; Heather_Patterson@urscorp.com Fax Number: 503-222-4292	
3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.	Arya Behbehani-Divers Portland General Electric Manager, Environmental Services  121 SW Salmon Street - 3WTCBR05 Portland, OR 97204 Telephone Number: 503-464-8141 Fax Number: 503-464-8527 Electronic Mail Address: <a href="mailto:Arya.Behbehani-Divers@pgn.com">Arya.Behbehani-Divers@pgn.com</a>	
<b>Section 2.0 - Owner/Operator Information</b>		

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<p>4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 to Present). Please note that this question includes any aquatic lands owned or leased by Respondent.</p>	<p>Portland General Electric Company (PGE) is preparing separate 104(e) responses for properties within the Investigation Area. This response only applies to the Willbridge Substation (located at 6333 NW Saint Helens Road, Portland, Oregon) and the other adjacent, undeveloped PGE-owned parcels.</p> <p>As shown in the attached plat (Q04a_WillbridgePlat.pdf), this response includes five parcels currently owned by PGE: Parcel A, Parcel F, Parcel G, Parcel H, and Parcel I. Parcel A is comprised of the portion upon which the substation is located (Lots 2-5 and 27-30, Block 8) and a portion that is undeveloped (Lots 1 and 31, Block 8), which are referred to herein as Parcel A-Sub and Parcel A-Un, respectively. Parcel A-Sub, Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I are described as follows:</p> <p>Parcel A-Sub – the developed parcel (Lots 2 through 5 and Lots 27 through 30, Block 8) that includes the Willbridge Substation</p> <p>Parcel A-Un – Several currently undeveloped, vegetated areas adjacent to the Willbridge Substation:</p> <ol style="list-style-type: none"> <li>1) Lot 1, Block 8 – northwest of Willbridge Substation and historically leased by Specialty Truck Parts Inc.,</li> <li>2) Lots 1, 4, 9, and 15, Block 9; and Lots 8 and 9, Block 10 – south and southwest of Willbridge Substation and encumbered with electric transmission lines; therefore, they cannot be developed</li> <li>3) Lot 5, Block 9 and Lots 15 and 16, Block 11 – south and northwest of the Willbridge Substation and undeveloped</li> </ol> <p>Parcel F – the currently undeveloped, vegetated parcel (Lot 13 and 14, Block 11) northwest of the Willbridge Substation from which PGE removed buildings shortly after purchasing</p> <p>Parcel G – the currently undeveloped, vegetated parcel (Lot 31, Block 8) northwest of the Willbridge Substation</p> <p>Parcel H – the undeveloped, vegetated parcel west and northwest of the Willbridge Substation</p> <p>Parcel I – the undeveloped, vegetated parcel west of the Willbridge Substation</p> <p>As defined herein, “the site”, “the property”, “the facility”, “the substation,” and “Willbridge Substation” all refer exclusively to Parcel A-Sub. The responses to the majority of these questions are applicable only to Parcel A-Sub. For questions that are applicable to more than just Parcel A-Sub, individual answers are listed for each.</p> <p>The Willbridge Substation has, at times, been confused with a property neighboring the substation to the southeast. The substation is located along St Helens Road between NW 63<sup>rd</sup></p>	

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	and 64 <sup>th</sup> Avenues at 6333 NW St Helens Road. The neighboring property is located between NW 62 <sup>nd</sup> and 63 <sup>rd</sup> Avenues at 6215 NW St Helens Road. The neighboring property is currently a vehicle refueling and service station. PGE has no relationship to this property and it is not the subject of this response. According to Portland Maps, it is owned by Star and leased to New Delco Petroleum LLC. On Portland Maps, the address of the Star property is misidentified as being located at 6115 NW St Helens Road and the Willbridge Substation is misidentified as being located at 6215 NW St. Helens Rd.	
a. Currently Owns	PGE currently owns the Willbridge parcels (Parcel A-Sub, Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I). See the attached plat (Q04a_WillbridgePlat.pdf) and the inset diagram on the attached figure (Q04a_Willbridge Substation Layout.pdf).	Question 4 Attachments Q04a_WillbridgePlat.pdf Q04a_2000 Willbridge Substation Layout.pdf (CEII <sup>1</sup> )
b. Currently Leases	Not applicable. PGE does not lease the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).	
c. Currently Operates	PGE currently operates the Willbridge Substation. See the plat (Q04a_WillbridgePlat.pdf) attached in response to Question 4a.	Question 4 Attachment Q04a_WillbridgePlat.pdf
d. Currently otherwise affiliated with	Not applicable. There are no other properties currently affiliated with the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).	
e. Historically Has Owned	Properties that PGE has historically owned within the Investigation Area are addressed in separate 104(e) responses.	
f. Historically Has Leased	Not applicable. PGE did not historically lease the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) prior to ownership.	
g. Historically Has Operated	Not applicable. PGE did not operate the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) prior to ownership.	
h. Historically otherwise affiliated with	Not applicable. Since PGE has owned the Willbridge Substation (Parcel A-Sub) and the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I), they have not been affiliated with any other properties.	
5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.		
a. Relationship	Owner	

<sup>1</sup> Attachment located on the Confidential Critical Energy Infrastructure Information (CEII) CD

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b. Address	<p>The Willbridge Substation (Parcel A-Sub) address is: 6333 NW Saint Helens Road Portland, OR 97210</p> <p>The only address associated with any of the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) is for Parcel F: 6411 NW 64<sup>th</sup> Avenue Portland, OR 97210</p>	
c. Multnomah County Alternative Tax ID #	<p>The alternative tax numbers for the Willbridge Substation (Parcel A-Sub) are: R915501280 (Lots 2 through 5, Block 8) R915501700 (Lots 27 through 30, Block 8)</p> <p>The alternative tax numbers for Parcel A-Un: R915501260 (Lot 1, Block 8) R915502750 (Lots 15 &amp; 16, Block 11) R915501800 (Lot 1, Block 9) R915501890 (Lots 4 &amp; 5, Block 9) R915502010 (Lot 9, Block 9) R915502130 (Lot 15, Block 9) R915502300 (Lot 8, Block 10) R915502310 (Lot 9, Block 10)</p> <p>The alternative tax number for Parcel F: R915502710 (Lots 13 &amp; 14, Block 11)</p> <p>The alternative tax number for Parcel G: R915501780 (Lot 31, Block 8)</p> <p>The alternative tax numbers for Parcel H: R915501830 (Lot 2, Block 9) R915502150 (Lots 1 through 5, Block 10) R915502250 (Lots 6 &amp; 7, Block 10)</p> <p>The alternative tax number for Parcel I: R915501870 (NE half of Lot 3, Block 9,)</p> <p>See the attached documents and the document (Q04a_WillbridgePlat.pdf) attached in response to Question 4a.</p>	<p>Question 5 Attachments Q05c_Substation Property Details.pdf Q05c_Undeveloped Properties Details.pdf</p> <p>Also see Question 4 Attachment Q04a_WillbridgePlat.pdf</p>
d. Date Acquired (leased)	<p>The Willbridge Substation (Parcel A-Sub) and Parcel A-Un were conveyed to PGE on 6 December 1973 from the Pacific Power &amp; Light Company (now PacifiCorp).</p> <p>Parcel F was purchased on 2 September, 1975 from Albert and Josephine O'Brien.</p> <p>Parcel G was purchased on 2 February, 1976 from Specialty Truck Parts, Inc.</p>	<p>See Question 4 Attachment Q04a_WillbridgePlat.pdf</p> <p>Also see Question 7 Attachment Q07_PGE-PPL_Willbridge Transfer.pdf Q07_1975-09-02 OBrien Warranty Deed.pdf</p>

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	<p>Parcel H was purchased on 23 September, 1976 from the State of Oregon, Division of State Lands.</p> <p>Parcel I was purchased on 21 November, 1980 from Penny and Carl Buttke.</p> <p>See the document (Q04a_WillbridgePlat.pdf) attached in response to Questions 4a and the deeds attached in response to Question 7.</p>	<p>Q07_1976-02-02 Specialty Truck BSDeed.pdf Q07_1976-09-23 State of OR Deed.pdf Q07_1980 Buttke Deed.pdf</p>
e. Period of Lease	Not applicable. PGE is the owner of the Willbridge Substation (Parcel A-Sub) and the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).	
f. Period of Ownership, Lease or Operation	<p>The Willbridge Substation (Parcel A-Sub): 1973 to present.</p> <p>The adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I): acquired between 1973 and 1980 (see responses to Questions 5d and 7) to present.</p>	
g. Activities	<p>In 1973, the Willbridge Substation (Parcel A-Sub) was conveyed to PGE by Pacific Power &amp; Light Company (now PacifiCorp). Pacific Power &amp; Light Company (now PacifiCorp) operated the parcel as a substation for a number of years before it was transferred to PGE. Since then, the substation has undergone equipment upgrades and modifications, as needed. PGE has used the property exclusively for substation operations since 1973. See the attached photographs (Q05g_Willbridge Substation Photos.pdf).</p> <p>Willbridge Substation (Parcel A-Sub) Purpose:</p> <ul style="list-style-type: none"> <li>• Provide continuous electrical power to customers; and</li> <li>• Protect public, customer, and equipment from electrical and mechanical faults.</li> </ul> <p>Willbridge Substation (Parcel A-Sub) Function:</p> <p>As a distribution substation - engineered and crafted collection of high voltage equipment, which transforms higher sub-transmission voltage (57kv) to lower distribution voltage (11kv and 4kv). High voltage switches and circuit breakers allow the circuits to be safely opened for routine maintenance or to interrupt electrical faults. Automatic operation is achieved through control, protection, telemetry, and communication systems located within the substation. As such, on-site activities are limited to maintenance, repair, and replacement of substation components as they are needed.</p> <p>Portions of Parcel A-Un (Lots 9, 15, westerly one-half of Lot 1, westerly one-half of Lot 4, Block 9; and Lots 8 and 9, Block 10) are encumbered with electric transmission lines and, therefore, cannot be developed. PGE does not conduct operations in these portions of Parcel A-Un; the only activities PGE conducts is maintenance, as needed, for these electrical transmission lines.</p> <p>In 1976, PGE removed the buildings that were present on Parcel F, which PGE purchased in 1975. See the attached document (Q05g_1976-09-29 Building Removal.pdf). Other than the removal of those buildings, PGE has not developed these parcels and has not conducted any activities on these parcels.</p>	<p>Question 5 Attachments Q05g_1976-09-29 Building Removal.pdf Q05g_Willbridge Substation Photos.pdf</p>

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	<p>Based on the attached document (Q05g_1976-09-29 Building Removal.pdf), a portion of Parcel A-Un (Lot 1, Block 8) appears to have been historically leased to Specialty Truck Parts, Inc. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know how long the parcel was leased to Specialty Truck Parts, Inc; however, it is reasonable to assume that it was only until the adjacent Parcel G was purchased from Specialty Truck Parts, Inc in 1976. PGE has not developed and did/does not conduct any activities on these parcels.</p> <p>Parcel H, Parcel I, and the remaining portions of Parcel A-Un (easterly one-half of Lot 1, easterly on-half of Lot 4, north easterly half of Lot 3, and Lot 5, Block 9) are undeveloped. PGE did/does not conduct any activities on these parcels.</p>	
6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:		
a. partners or joint ventures;	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, no partners or joint ventures have exercised actual control or held significant authority to control activities at the Willbridge Substation (Parcel A-Sub) and the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).	
b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);	To the best of PGE's knowledge, after reasonable inquiry, no consultants or subcontractors have exercised control over any materials handling, storage, or disposal activities at the Willbridge Substation (Parcel A-Sub) and the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).	
c. any person subleasing land, equipment or space on the Property;	<p>To the best of PGE's knowledge, after reasonable inquiry, the following is a summary of the known leases of land or space on PGE-owned Willbridge parcels:</p> <p><u>Specialty Truck Parts, Inc – Land Lease of Parcel A-Un (Lot 1, Block 8)</u> Based on the document (Q05g_1976-09-29 Building Removal.pdf) attached in response to Question 5g, a portion of Parcel A-Un (Lot 1, Block 8) appears to have been historically leased to Specialty Truck Parts, Inc.</p> <p><u>Billboard Advertisement - Space Lease on Parcel A-Un (Lot 1, Block 8)</u> A portion of Parcel A-Un (Lot 1, Block 8) has been used for billboard advertisements since at least 1949 originating with lease agreements between Pacific Power &amp; Light Co. (now PacifiCorp) and Foster &amp; Kleiser Company. Foster &amp; Kleiser was sold to W.R. Grace &amp; Co in 1952 and then to Ackerley Communications of the NW, Inc (Ackerley Comm.) in 1975. A</p>	<p>See Question 5 Attachment Q05g_Willbridge Substation Photos.pdf</p> <p>Also see Question 7 Attachments Q07_1987 Ackerley Lease Agmt.pdf Q07_2001 Aug Clear Channel Lease.pdf Q07_2007 Oct Clear Channel Lease.pdf Q07_2008 Clear Channel Lease.pdf</p>

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	<p>renewal lease agreement between PGE and Ackerley Comm. was issued on 1 August, 1987. See the document (Q07_1987 Ackerley Lease Agmt.pdf) attached in response to Question 7, and the photos (Q05g_Willbridge Substation Photos.pdf) attached in response to Question 5g.</p> <p>The Foster &amp; Kleiser division was then sold to Patrick Media Co in 1995, which became a subsidiary of Clear Channel Outdoor in 1997. Renewal lease agreements for the billboard on Parcel A-Un (Lot 1, Block 8) between PGE and Clear Channel Outdoor have been issued in August 2001, 2007, and 2008. See the documents (Q07_2001 Clear Channel Lease.pdf, Q07_2007 Clear Channel Lease.pdf, and Q07_2008 Clear Channel Lease.pdf) attached in response to Question 7.</p>	
d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;	To the best of PGE's knowledge, after reasonable inquiry, there are no utilities, pipelines, railroads, or easements on the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) other than PGE utilities. Utilities installed by PGE are described in the response to Question 13b.	
e. major financiers and lenders;	Not applicable. None have been identified.	
f. any person who exercised actual control over any activities or operations on the Property;	<p>To the best of PGE's knowledge, after reasonable inquiry, only PGE personnel have exercised actual control over activities and operations at the Willbridge Substation (Parcel A-Sub), maintenance activities, if any, on the transmission lines a the portion of Parcel A-Un (Lots 9, 15, westerly one-half of Lot 1, westerly one-half of Lot 4, Block 9; and Lots 8 and 9, Block 10), and building removal activities on Parcel F. See the responses to Questions 5g, 6g, and 6h.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, only PGE personnel (see responses to Questions 6g and 6h), Specialty Truck Parts Inc, and Clear Channel Outdoor (and under various predecessor names) have exercised actual control over activities or operations on a portion of Parcel A-Un (Lot 1, Block 8). See the responses to Questions 6c, 6g, and 6h.</p> <p>Parcel H, Parcel I, and the remaining portions of Parcel A-Un (easterly one-half of Lot 1, easterly on-half of Lot 4, north easterly half of Lot 3, and Lot 5, Block 9) are undeveloped. PGE did/does not conduct any activities or operations on these parcels.</p>	
g. any person who held significant authority to control any activities or operations on the Property;	<p>Multiple individuals have had authority within PGE to access and conduct activities on the Willbridge Substation (Parcel A-Sub) and the adjacent, undeveloped parcels (portions of Parcel A-Un and Parcel F). Many are listed on the following documents:</p> <ul style="list-style-type: none"> <li>• Bullseye articles 1973 and 1980.</li> <li>• Organizational charts for the years: 1980, 1982, 1984, 1986, 1988, 1989, 1990, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, and 2005</li> <li>• Distribution and System Planning information.</li> <li>• Management structure information 1982-2007.</li> </ul>	<p>Question 6 Attachments</p> <p>Q06g_Bullseye articles.pdf</p> <p>Q06g_Organizational Charts.pdf</p> <p>Q06g_Distribution and System Planning Information.pdf</p> <p>Q06g_HRIC Structure Report 2008.pdf</p> <p>Q06g_HRIC Structure Info 1982-2007.pdf</p>
h. any person who had a significant presence or who conducted significant activities at the Property; and	<p>Multiple individuals have had authority within PGE to access and conduct activities on the Willbridge Substation (Parcel A-Sub) and the adjacent, undeveloped parcels (portions of Parcel A-Un and Parcel F). Many are listed on the following documents:</p> <ul style="list-style-type: none"> <li>• Bullseye articles 1956, 1957, 1958, 1959, 1960, 1961, 1963, 1967, 1971, 1973 and 1980.</li> </ul>	



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	<ul style="list-style-type: none"> <li>Organizational charts for the years: 1980, 1982, 1984, 1986, 1988, 1989, 1990, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, and 2005</li> <li>Distribution and System Planning information.</li> <li>Management structure information 1982-2007</li> </ul> <p>See the documents attached in response to Question 6g.</p>	
i. government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.	To the best of PGE's knowledge, after reasonable inquiry, no government entities have (or had) a proprietary interest or involvement at the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).	
<b>Section 2.0 - Owner/Operator Information (continued)</b>		
<p>7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest: when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.). Also provide all information and documentation regarding, but not limited to the following:</p>	<p>The document (Q04a_WillbridgePlat.pdf) attached in response to Question 4a indicates when and from whom the parcels comprising the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) were purchased.</p> <p>The Willbridge Substation (Parcel A-Sub) and Parcel A-Un were conveyed to PGE on 6 December, 1973 from the Pacific Power &amp; Light Company (now PacifiCorp). Pacific Power &amp; Light Company (now PacifiCorp) operated the Willbridge Substation (Parcel A-Sub) as a substation for a number of years before it was transferred to PGE. This conveyance was part of a larger agreement between the electric companies to consolidate operations at overlapping service areas, whereby some properties were transferred to PGE and other were transferred to PacifiCorp. The PacifiCorp Agreement is provided in a supplemental submittal (Supplemental Submittal S5), but the portions of it specific to the Willbridge parcels is attached (Q07_PGE-PPL_Willbridge Transfer.pdf).</p> <p>Parcel F was purchased on 2 September, 1975 from Albert and Josephine O'Brien. See the attached deed (Q07_1975-09-02 OBrien Warranty Deed.pdf).</p> <p>Parcel G was purchased on 2 February, 1976 from Specialty Truck Parts, Inc. See the attached deed (Q07_1976-02-02 Specialty Truck BSDeed.pdf).</p> <p>Parcel H was purchased on 23 September, 1976 from the State of Oregon, Division of State Lands. See the attached deed (Q07_1976-09-23 State of OR Deed.pdf).</p> <p>Parcel I was purchased on 21 November, 1980 from Penny and Carl Buttke. See the attached deed (Q07_1980 Buttke Deed.pdf).</p> <p>See the responses to Questions 4 and 5, above.</p> <p>Also see the response to Question 6c and the attached leases (Q07_1987 Ackerley Lease Agmt.pdf, Q07_2001 Aug Clear Channel Lease.pdf, Q07_2007 Oct Clear Channel Lease.pdf,</p>	<p>Question 7 Attachment  Q07_PGE-PPL_Willbridge Transfer.pdf  Q07_1975-09-02 OBrien Warranty Deed.pdf  Q07_1976-02-02 Specialty Truck BSDeed.pdf  Q07_1976-09-23 State of OR Deed.pdf  Q07_1980 Buttke Deed.pdf  Q07_1987 Ackerley Lease Agmt.pdf  Q07_2001 Aug Clear Channel Lease.pdf  Q07_2007 Oct Clear Channel Lease.pdf  Q07_2008 Clear Channel Lease.pdf</p> <p>Also see Question 4 Attachment  Q04a_WillbridgePlat.pdf</p>



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EPA Question	Response	Records/Information Available
	Q07_2008 Clear Channel Lease.pdf) for information on persons leasing land or space on a portion of Parcel A-Un (Lot 1, Block 8).	
a. any deeds and/or transfer information between Respondent and Dulien Steel Products;	Not applicable. Question 7a is relevant only to the Rivergate North Substation. Information regarding this question is given in the separate 104(e) response for that site.	
b. deed and title information for Parcels R971340160, R971340180, R971350100, R971350480, R941191230, R971340130 and R971340200;	Not applicable to the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).	
c. a complete copy of the Memorandum of Contract Book 1292 p.616 for parcel R941191230, dated September 5, 1978;	Not applicable to the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).	
8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.	To the best of PGE's knowledge, after reasonable inquiry, PGE did not know of, and had no reason to know of, the disposal or placement of hazardous substances, waste, or materials on or at any part of the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) that may have occurred prior their acquisition. To the best of PGE's knowledge, after reasonable inquiry, no site investigations were performed on the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) prior to taking ownership.	
9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.	To the best of PGE's knowledge, after reasonable inquiry, PGE did not know of, and had no reason to know of, any potential hazardous substance, waste, or material disposal on the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) prior to their acquisition. To the best of PGE's knowledge, after reasonable inquiry, no site investigations were performed on the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) prior to taking ownership.	

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<p>10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known:</p> <p>a. The dates of ownership</p> <p>b. All evidence showing that they controlled access to the Property</p> <p>c. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Property during the period that they owned the Property.</p>	<p>The document (Q04a_WillbridgePlat.pdf) attached in response to Question 4a indicates when and from whom the parcels comprising the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) were purchased.</p> <p>The attached Sanborn map (Q10_Willbridge Sanborn Maps.pdf) shows that in 1969 the Willbridge Substation (Parcel A-Sub) was being used as a transformer yard, that the adjacent portions of Parcel A-Un (Lots 1 and 31, Block 8) were being used to store truck parts, and that Parcel F had a building located on it. The 1969 Sanborn map does not indicate ownership of these parcels. Although there is a 1950 Sanborn map, the map doesn't show any details of the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).</p> <p>According to the document (Q07_PGE-PPL_Willbridge Transfer.pdf) attached in response to Question 7, the parcels that comprise the Willbridge Substation (Parcel A-Sub) and Parcel A-Un were conveyed to PGE on 6 December, 1973 from the Pacific Power &amp; Light Company (now PacifiCorp). The Pacific Power &amp; Light Company (now PacifiCorp) operated the Willbridge Substation (Parcel A-Sub) as a substation for a number of years before it was transferred to PGE. The document also indicates from whom Pacific Power &amp; Light Company (now PacifiCorp) purchased the parcels:</p> <ul style="list-style-type: none"> <li>• Lots 1-5, Block 8 – Purchased from Julius C. Kaye on 25 August, 1948</li> <li>• Lots 27-30, Block 8 – Purchased from Gilbert Nord on 17 September, 1948</li> <li>• Lots 4-5, Block 9 – Purchased from Multnomah County on 15 November, 1948</li> <li>• Lot 9, Block 9 – Purchased from Florence and Byron Clement on 28 October, 1948</li> <li>• Lot 15, Block 9; Lot 9, Block 10; and Lots 15-16, Block 11 – Purchased from Multnomah County on 5 October, 1960</li> <li>• Lot 1, Block 9 and Lot 8, Block 10 – Purchased from Mabel E Shuck on 7 September, 1960</li> </ul> <p>Parcel F (Lots 13 and 14, Block 11) was purchased on 2 September, 1975 from Albert and Josephine O'Brien. See the deed (Q07_1975-09-02 OBrien Warranty Deed.pdf) attached in response to Question 7.</p> <p>Parcel G (Lot 31, Block 8) was purchased on 2 February, 1976 from Specialty Truck Parts, Inc. See the deed (Q07_1976-02-02 Specialty Truck BSDeed.pdf) attached in response to Question 7.</p> <p>Parcel H (Lot 2, Block 9 and Lots 1 through 7, Block 10) were purchased on 23 September, 1976 from the State of Oregon, Division of State Lands. See the deed (Q07_1976-09-23 State of OR Deed.pdf) attached in response to Question 7.</p> <p>Parcel I (northern half of Lot 3, Block 9) was purchased on 21 November, 1980 from Penny and Carl Buttke. See the deed (Q07_1980 Buttke Deed.pdf) attached in response to Question 7.</p>	<p>Question 10 Attachment Q10_Willbridge Sanborn Maps.pdf</p> <p>Also see Question 4 Attachment Q04a_WillbridgePlat.pdf</p> <p>Also see Question 7 Attachments Q07_PGE-PPL_Willbridge Transfer.pdf Q07_1975-09-02 OBrien Warranty Deed.pdf Q07_1976-02-02 Specialty Truck BSDeed.pdf Q07_1976-09-23 State of OR Deed.pdf Q07_1980 Buttke Deed.pdf</p>

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	<p>To the best of PGE's knowledge, after reasonable inquiry, PGE does not have further knowledge or records of prior owners or operations by prior owners on the Property.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, no site investigations were performed on the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) prior to taking ownership. To the best of PGE's knowledge, after reasonable inquiry, PGE has no knowledge of a hazardous substance, pollutant, or contaminant that was released or threatened to be released at the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) prior to PGE's purchase/acquisition.</p> <p>Also see the responses to Questions 4 through 7, above.</p>	
<p>11. Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known:</p> <p>a. the dates of operation;</p> <p>b. the nature of prior operations at the Property;</p> <p>c. all evidence that they controlled access to the Property; and</p> <p>d. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they were operating the Property</p>	<p>See the responses to Questions 4 through 7 and Question 10 and the documents attached in response to Question 4a, Question 7, and Question 10.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, PGE does not have information on prior operations on the Property other than the information contained in the responses to Questions 5g, 6c and 10, above.</p>	<p>See Question 4 Attachment Q04a_WillbridgePlat.pdf</p> <p>Also see Question 5 Attachments Q05g_1976-09-29 Building Removal.pdf</p> <p>Also see Question 7 Attachment Q07_PGE-PPL_Willbridge Transfer.pdf Q07_1975-09-02 OBrien Warranty Deed.pdf Q07_1976-02-02 Specialty Truck BSDeed.pdf Q07_1976-09-23 State of OR Deed.pdf Q07_1980 Buttke Deed.pdf Q07_1987 Ackerley Lease Agmt.pdf Q07_2001 Aug Clear Channel Lease.pdf Q07_2007 Oct Clear Channel Lease.pdf Q07_2008 Clear Channel Lease.pdf</p> <p>Also see Question 10 Attachment Q10_Willbridge Sanborn Maps.pdf</p>
<p>12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.</p>	<p>Not applicable. There are no aquatic lands leases associated with the Willbridge Substation (Parcel A-Sub) or the adjacent, undeveloped parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I).</p>	

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<b>Section 3.0 - Description of Each Property</b>		
13. Provide the following information about each Property identified in response to Question 4:	The responses to the questions in Sections 3.0, 4.0, 5.0, and 6.0 only pertain to the Willbridge Substation (Parcel A-Sub), on which PGE developed and had/has substation operations. The other adjacent, currently-owned parcels (Parcel A-Un, Parcel F, Parcel G, Parcel H, and Parcel I) are undeveloped and are not addressed in Sections 3.0, 4.0, 5.0, or 6.0.	
a. property boundaries, including a written legal description;	The Willbridge Substation is located in Section 13 in Township 1 North, Range 1 West of the Willamette Meridian, in the City of Portland, County of Multnomah, State of Oregon. The Willbridge Substation is bounded to the northeast by NW Saint Helens Rd, to the southeast by NW 63 <sup>rd</sup> Ave, to the southwest by NW Willbridge Ave, and to the northwest by portions of Parcel A-Un (Lots 1 and 31, Block 8), which are adjacent to NW 64 <sup>th</sup> Ave. Please see the document (Q04a_WillbridgePlat.pdf) attached in response to Question 4a and the document (Q07_PGE-PPL_Willbridge Transfer.pdf) attached in response to Question 7.	See Question 4 Attachment Q04a_WillbridgePlat.pdf  Also see Question 7 Attachment Q07_PGE-PPL_Willbridge Transfer.pdf
b. location of underground utilities (telephone, electrical, sewer, water main, etc.);	To the best of PGE's knowledge, after reasonable inquiry, there are no underground power distribution circuits, structures or equipment at the Willbridge Substation. The attached figure (Q13b_Fieldview_Willbridge.pdf) and the figure (Q04a_2000 Willbridge Substation Layout.pdf) attached in response to Question 4 show the location of above-ground substation equipment and transmission lines.  To the best of PGE's knowledge, after reasonable inquiry, and based on the attached maps from Portland Maps (Q13b_Willbridge Sewer.pdf and Q13b_Willbridge Water.pdf), there are/were no municipal sewer or water lines within the Willbridge Substation. To the best of PGE's knowledge, after reasonable inquiry, there are no other underground utilities located within the Willbridge Substation.	Question 13 Attachments Q13b_Fieldview_Willbridge.pdf Q13b_Willbridge Sewer.pdf Q13b_Willbridge Water.pdf  Also see Question 4 Attachment Q04a_2000 Willbridge Substation Layout.pdf (CEII <sup>1</sup> )
c. location of all underground pipelines whether or not owned, controlled or operated by you;	To the best of PGE's knowledge, after reasonable inquiry, there are no underground pipelines located within the Willbridge Substation.	
d. surface structures (e.g., buildings, tanks, pipelines, etc.);	In addition to power poles, the following is a description of the other surface structures located at the Willbridge Substation:  <i>Buildings:</i> <ul style="list-style-type: none"><li>• Control building – protective relays, telemetry, communications, and control equipment.</li></ul> <i>Structures:</i> <ul style="list-style-type: none"><li>• Transmission structure – supports high voltage conductors and switches.</li><li>• Distribution structure – supports medium voltage conductors and switches.</li></ul> <i>Equipment:</i> <ul style="list-style-type: none"><li>• Four power circuit breakers</li><li>• One power transformers</li><li>• Two station service transformers</li></ul>	

<sup>1</sup> Attachment located on the Confidential Critical Energy Infrastructure Information (CEII) CD

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e. over-water structures (e.g., piers, docks, cranes, etc.);	There are no over-water structures at the Willbridge Substation.	
f. dry wells;	To the best of PGE's knowledge, after reasonable inquiry, there are no dry wells at the Willbridge Substation.	
g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);	There are no treatment or control devices at the Willbridge Substation.	
h. groundwater wells, including drilling logs;	To the best of PGE's knowledge, after reasonable inquiry, there are no groundwater wells at the Willbridge Substation.	
i. stormwater drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;	<p>To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the substation's stormwater drainage:</p> <ul style="list-style-type: none"> <li>• Substation stormwater infiltrates through the gravel surface or is drained from the site via drain tiles.</li> <li>• The drain tiles direct stormwater into an open ditch that begins just outside of the northern corner of the substation.</li> <li>• The stormwater flows from the open ditch into a culvert, which begins on 64<sup>th</sup> Avenue and continues under St. Helens Road.</li> <li>• Once on the other side of St. Helens Road, the culvert directs stormwater into an open ditch along the railroad where it infiltrates into the ground.</li> </ul> <p>There are no apparent surface water flow routes to the Willamette River, which is located approximately 2,000 ft from the Willbridge Substation. See the attached documents (Q13i_Grading.pdf and Q13i_FoundationGrounding.pdf). Also see the response to Question 18 and the document (Q19_Willbridge_SPCC_Aug_22_2008.pdf) attached in response to Question 19.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, there are/were no municipal sewer or water lines within the Willbridge Substation. See the response to Question 13b.</p>	<p>Question 13 Attachment Q13i_2001_Grading.pdf Q13i_2001_Foundation&amp;Grading.pdf (CEII<sup>1</sup>)</p> <p>Also see Question 19 Attachment Q19_Willbridge_SPCC_Aug_22_2008.pdf</p>
j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed.	To the best of PGE's knowledge, after reasonable inquiry, there are no subsurface disposal fields or UIC wells at the Willbridge Substation.	

<sup>1</sup> Attachment located on the Confidential Critical Energy Infrastructure Information (CEII) CD

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k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the Property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;	<p>To the best of PGE's knowledge, after reasonable inquiry, the only major modifications at the Willbridge Substation since PGE acquired the substation in 1973 was the replacement of cement equipment footings on October 1, 2001. See Attachment D in the SPCC Plan (Q19_Willbridge_SPCC_Aug_22_2008.pdf) attached in response to Question 19.</p> <p>As shown in the document (Q13i_2001_Foundation&amp;Grading.pdf) attached in response to Question 13i, PGE plans include a potential extension of the circuit breaker bays sometime in the future.</p>	<p>Question 13 Attachments Q13i_2001_Foundation&amp;Grading.pdf (CEII<sup>1</sup>)</p> <p>Also see Question 19 Attachment Q19_Willbridge_SPCC_Aug_22_2008.pdf</p>
l. all maps and drawings of the Property in your possession; and	<p>Please refer to the attached maps.</p> <p>Also see the figures attached in response to other questions herein.</p>	<p>Question 13 Attachments Q13l_1948 Property Map.pdf Q13l_Map Drawing.pdf</p>
m. all aerial photographs of the Property in your possession.	<p>Aerial photographs are available at Google Maps, Google Earth, and Portland Maps. A 1979 aerial photo showing vicinity layout is attached, as well as 2001-2007 aerial photographs from Portland Maps.</p>	<p>Question 13 Attachment Q13m_Willbridge Aerials_2001-2007.pdf Q13m_1979_Vicinity Layout with Aerial.pdf Q13m_2007_Aerial Photo.pdf</p>
n. all information requested in (a) through (m) above regarding, but not limited to, the following:		
i. the Portland General Electric Station L location on 1841 SE Water Ave;	<p>See the separate 104(e) response for Station L.</p>	
ii. the Portland General Electric Station E location on 2635 NW Front Ave;	<p>See the separate 104(e) response for Station E.</p>	
iii. the Portland General Electric Station N location on 6616 N Lombard St.;	<p>See the separate 104(e) response for Station N.</p>	
14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.	<p>Not applicable. The Willbridge Substation is not adjacent to the Willamette River.</p>	

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<p>15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.</p>	<p>Soil characterization sampling was conducted in October 1996. Four composite soil samples were collected and tested for PCB content. Laboratory results indicated no detectable concentrations of PCBs; see the attached document (Q15_Soil Data 10-31-1996.pdf).</p> <p>The Willbridge SPCC Plan (Q19_Willbridge_SPCC_Aug_22_2008.pdf), attached in response to Question 19, briefly discusses topography and soil condition at the Willbridge Substation. Also see the spill report (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, the attached documents include all the data reports PGE was able to locate for the Willbridge Substation related to soil, water (ground and surface), or air quality and geology/hydrogeology.</p>	<p>Question 15 Attachments                      Q15_Soil Data 10-31-1996.pdf</p> <p>Also see Question 19 Attachment                      Q19_Willbridge_SPCC_Aug_22_2008.pdf</p> <p>Also see Question 62 Attachment                      Q62_Willbridge Spill Report 8-8-05.pdf</p>
<p>16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:</p> <p>a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;</p> <p>b. dated aerial photograph of the site showing each unit/area;</p> <p>c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;</p> <p>d. the dates that the unit/area was in use;</p>	<p>Not applicable. To the best of PGE's knowledge, after reasonable inquiry, there are no past or present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) at the Willbridge Substation.</p>	



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e. the purpose and past usage (e.g., storage, spill containment, etc.); f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area and; g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.		
17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.	Not applicable to the Willbridge Substation. See response to Question 16.	
18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:		
a. the location and nature of each sewer line, drain, ditch, or tributary;	<p>To the best of PGE's knowledge, after reasonable inquiry, and based on the maps from Portland Maps (Q13b_Willbridge Sewer.pdf and Q13b_Willbridge Water.pdf) attached in response to Question 13b, there are/were no municipal sewer or water lines within the Willbridge Substation.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, the following summarizes the substation's stormwater drainage:</p> <ul style="list-style-type: none"> <li>• Substation stormwater infiltrates through the gravel surface and/or is drained from the site via drain tiles.</li> <li>• The drain tiles direct stormwater into an open ditch that begins just outside of the northern corner of the substation.</li> <li>• The stormwater flows from the open ditch into a culvert, which begins on 64<sup>th</sup> Avenue and continues under St. Helens Road.</li> <li>• Once on the other side of St. Helens Road, the culvert directs stormwater into an</li> </ul>	<p>See Question 13 Attachments            Q13b_Willbridge Sewer.pdf            Q13b_Willbridge Water.pdf            Q13i_2001_Grading.pdf            Q13i_2001_Foundation&amp;Grading.pdf (CEII<sup>1</sup>)</p> <p>Also see Question 19 Attachment            Q19_Willbridge_SPCC_Aug_22_2008.pdf</p>

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	<p style="text-align: center;">open ditch along the railroad where it infiltrates into the ground.</p> <p>There are no apparent surface water flow routes to the Willamette River, which is located approximately 2,000 ft from the Willbridge Substation. See the attached documents (Q13i_Grading.pdf and Q13i_FoundationGrounding.pdf). Also see the response to Question 18 and the document (Q19_Willbridge_SPCC_Aug_22_2008.pdf) attached in response to Question 19.</p>	
b. the date of construction of each sewer line, drain, ditch, or tributary;	To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate any records indicating the installation dates of these features.	
c. whether each sewer line, or drain was ever connected to a main trunk line;	Not applicable. See response to Questions 13b and 18a.	
d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and	To the best of PGE's knowledge, after reasonable inquiry, PGE is unaware of the discharge of waste, process water, or other materials to any sewers, drains, or ditches that drain to the Willamette River.	
e. any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:	Not applicable. The Willbridge Substation has no direct outfalls to the Willamette River within its borders.	
i. the areas serviced by the outfalls; and		
ii. the type of outfall (i.e., stormwater or single facility operational).		
19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans or Spill Plans developed for different operations during	The Willbridge Substation SPCC Plan and grading figures (Q13i_2001_Grading.pdf and Q13i_2001_Foundation & Grading.pdf, attached in response to Question 13i) are attached. The SPCC plan and grading figures are utilized by PGE to ensure that the Property has adequate operating procedures that prevent oil spills, control measures installed to prevent a spill from reaching navigable waters, and countermeasures to contain, clean up, and mitigate the effects of an oil spill that reaches navigable waters. The SPCC plan includes an evaluation of site stormwater drainage and the response procedures (e.g., berming) to be implemented to prevent spilled/released oil from discharging offsite. Site stormwater drainage is discussed in more detail in the responses to Questions 18 and 13i.	<p>Question 19 Attachments</p> <p>Q19_Willbridge_SPCC_Aug_22_2008.pdf</p> <p>Q19_Oil Spill First Response.pdf</p> <p>Q19_Oil Spill Response Team.pdf</p> <p>Q19_Environmental Services Oil Spill Instruction.pdf</p> <p>Q19_Oil Spill Cleanup Procedures.pdf</p> <p>Also see Question 13 Attachments</p> <p>Q13i_2001_Grading.pdf</p> <p>Q13i_2001_Foundation&amp;Grading.pdf (CEII<sup>1</sup>)</p>

<sup>1</sup> Attachment located on the Confidential Critical Energy Infrastructure Information (CEII) CD

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the Respondent's operation of each Property.	<p>General PGE spill clean up procedures are described in the attached documents (Q19_Environmental Services Oil Spill Instruction.pdf, Q19_Oil Spill Cleanup Procedures.pdf, Q19_Oil Spill Response Team.pdf, and Q19_Oil Spill First Response.pdf).</p> <p>Other than evaluation for SPCC requirements, to the best of PGE's knowledge, after reasonable inquiry, no drainage studies have been performed at the Willbridge Substation.</p>	
<b>Section 4.0 - Respondent's Operational Activities</b>		
20. Describe the nature of your operation or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.	See the response to Question 5g for a description of the activities performed at the Willbridge Substation. The purpose of the Willbridge Substation is to provide continuous electrical power to customers and to protect the public and equipment from electrical and mechanical faults. The Willbridge Substation was acquired in 1973 and is still in operation. See the response for Question 13k for substation modification details.	
21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:		
a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;	<p>Most of the functions of a substation are automatic and occur without direct supervision. No wastes, including municipal wastes, are generated during regular operations. Periodically, equipment is taken out of service for off-site maintenance. During these periods, waste material is generated. The primary materials used for maintenance are: transformer oil, solvents, denatured alcohol, degreasers, lubricating grease, hydraulic fluid, and paint. Soil and gravel removed from PGE properties during excavation (from upgrades or equipment spill response) are tested and disposed of appropriately, as needed.</p> <p>According to the Attachment D of the SPCC Plan (Q19_Willbridge_SPCC_Aug_22_2008.pdf) attached in response to Question 19, cement equipment footings were replaced in October 2001. As indicated in the attached document (Q21a_Concrete Data 07-17-2001.pdf) cement samples taken prior to removal of the footings were non-detect for PCBs. To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate disposal documentation for this cement removal; however, based on the document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a, this construction debris (cement) was likely disposed of at the Hillsboro Landfill.</p> <p>See the attached document (Q21a_Willbridge Oil-Filled Equipment.pdf) for the list of oil-filled</p>	<p>Question 21 Attachment Q21a_Concrete Data 07-17-2001.pdf Q21a_Waste Stream Summary.pdf Q21a_Willbridge Oil-Filled Equipment.pdf Q21a_1986_Oil Filled Equipment.pdf</p> <p>Also see Question 19 Attachment Q19_Willbridge_SPCC_Aug_22_2008.pdf</p> <p>Also see Question 33 Attachment Q33 EMC List.pdf</p> <p>Also see Question 40 Attachment Q40_Waste-Materials Receivers and Carriers.pdf</p>

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	<p>substation equipment currently at the Willbridge Substation. The document identifies the position, serial number, year manufactured, detected PCB concentrations and the date tested for PCBs, and oil volume of oil-filled equipment at the Willbridge Substation. Information on substation oil-filled equipment located at the Willbridge Substation in 1986 is presented in the attached document (Q21a_1986_Oil Filled Equipment.pdf).</p> <p>The products/materials currently used at PGE properties within Oregon and potentially used at the Willbridge Substation are listed in the document (Q33_EMC List.pdf) attached in response to Question 33. Material Safety Data Sheets (MSDS) are provided in a supplemental submittal (Supplemental Submittal S2). Products/materials used in the past are similar to those used currently.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, those companies/persons with whom PGE currently has arrangements for disposal/recycling/destruction of wastes and/or used material are listed in the attached document (Q21a_Waste Stream Summary.pdf). The document summarizes the current various waste stream types, the current initial carrier, the current interim storage (if applicable), the current secondary carrier (if applicable), and the current disposal/recycling facility. To the best of PGE's knowledge, after reasonable inquiry, all companies/persons with whom PGE has made arrangements for disposal/recycling/destruction of wastes and/or used material for PGE properties in Oregon are listed in the document (Q40_Waste-Materials Receivers and Carriers.pdf) attached in response to Question 40.</p>	
<p>b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;</p>	<p>The primary materials used for maintenance include transformer oil (liquid), solvents (liquid), denatured alcohol (liquid), degreasers (liquid), lubricating grease (semi-liquid), hydraulic fluid (liquid) and paint (liquid). The chemical composition, characteristics, and physical state of materials potentially used at the Site are described in the MSDS documents for the products/materials currently used at PGE properties within Oregon, which are provided in a supplemental submittal (Supplemental Submittal S2).</p> <p>According to the SPCC Plan (Q19_Willbridge_SPCC_Aug_22_2008.pdf) attached in response to Question 19, cement equipment footings (solid) were replaced in October 2001. Cement sampling was conducted in July 2001 prior to the replacement of the cement equipment footings. Laboratory results were non-detect for PCBs; see the document (Q21a_Concrete Data 07-17-2001.pdf) attached in response to Question 21a.</p> <p>In general, soil (solid) and gravel (solid) removed from PGE properties during other site excavations (from other site upgrades or equipment spill response) are tested (for petroleum-hydrocarbon and/or PCB contamination) and disposed of appropriately, as needed.</p> <p>Also see the documents attached in response to Question 21c, below.</p>	<p>Question 21 Attachments  Q21a_Concrete Data 07-17-2001.pdf</p> <p>Also see Question 19 Attachment  Q19_Willbridge_SPCC_Aug_22_2008.pdf</p>

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EPA Question	Response	Records/Information Available
<p>c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and</p>	<p>To the best of PGE's knowledge, after reasonable inquiry, no waste or materials are/were stored on site. Historically, wastes and used materials from within the Investigation Area were transported either directly to the appropriate disposal facility or to one of PGE's waste and material handling facilities at Harborton Substation (located at 12500 NW Marina Way, Portland, OR), Sellwood Substation (located at 8856 SE 13<sup>th</sup> Ave), Portland Service Center (PSC) (located at 3700 SE 17th Ave, Portland, Oregon), or Wilsonville (located at 9480 SW Boeckman Rd, Wilsonville, Oregon - only soil/gravel with &lt; 50 ppm PCBs) for interim storage prior to disposal/recycling/destruction. Currently, wastes and used materials that are not transported directly to the appropriate disposal facility are transferred to the current waste and material handling facilities (PSC and Wilsonville [only soil/gravel with &lt; 50 ppm PCBs]) for interim storage prior to disposal/recycling/destruction.</p> <p>Materials potentially contaminated with PCBs are sealed in barrels and transferred to PGE's waste and material handling facility (currently at PSC). Once received at the waste and material handling facility, these wastes are tested to determine a disposal location appropriate for their PCB concentration or assumed to contain PCBs. These wastes include:</p> <ul style="list-style-type: none"> <li>• Used/excess lubricants, oils, and other fluids</li> <li>• Obsolete equipment (e.g., transformers, capacitors)</li> <li>• Rags used to clean equipment</li> <li>• Absorbent material used to clean up leaks or spills</li> <li>• Ballasts</li> </ul> <p>Wastes not contaminated with PCBs (&lt; 50 ppm) are containerized separately and transferred to PGE's waste and material handling facility (currently at PSC). The Toxic Substances Control Act (TSCA) regulation standard and accepted industry standard is to use the term "non-PCB" to describe oils with &lt; 50 ppm PCBs; this term is used throughout this document. Non-PCB wastes include:</p> <ul style="list-style-type: none"> <li>• Solvents</li> <li>• Batteries</li> <li>• Scrap metal</li> <li>• Light bulbs</li> <li>• General garbage and recycling</li> </ul> <p>According to Attachment D of the SPCC Plan (Q19_Willbridge_SPCC_Aug_22_2008.pdf) attached in response to Question 19, cement equipment footings were replaced in October 2001. Cement samples taken prior to removal of the footings were non-detect for PCBs; see the document (Q21a_Concrete Data 07-17-2001.pdf) attached in response to Question 21a. To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate disposal documentation for this cement removal; however, based on the document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a, this construction debris (cement) was likely disposed of at the Hillsboro Landfill.</p>	<p>Question 21 Attachments              Q21a_Waste Stream Summary.pdf              Q21a_Concrete Data 07-17-2001.pdf              Q21c_Cleaning Up Small Mercury Spills 2008.pdf              Q21c_HID and Fluorescent Tube Storage Instructions.pdf              Q21c_PGE Aerosol Can Disposal Flowchart 2006.pdf              Q21c_PGE Battery Flow Chart 2007.pdf              Q21c_PGE Bulb &amp; Tube Recycling Flowchart 2006.pdf</p> <p>Also see Question 19 Attachment              Q19_Willbridge_SPCC_Aug_22_2008.pdf</p> <p>Also see Question 52 Attachments</p>

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	<p>Soil and gravel removed during excavations (from upgrades or equipment spill response) is tested and disposed of appropriately. The soil and gravel are either transported directly from the site to the disposal facility, or are transported to Wilsonville and/or PSC for interim storage before bulk disposal at a location dependant upon PCB content.</p> <p>See the attached documents for descriptions of PGE's waste and used material handling procedures. Also, see the document (Q21a_Waste Steam Summary.pdf) attached in response to Question 21a and the waste disposal permits attached in response to Question 52. The attached mercury spill cleanup guide is a general PGE guidance and does not imply that mercury spills have ever occurred at the Willbridge Substation.</p> <p>The Harborton Substation, which was historically a PGE waste and material handling facility, is within the Investigation Area and is addressed in a separate 104(e) response. Also see the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7).</p>	
<p>d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.</p>	<p>Waste was generated during substation operations associated with equipment maintenance and upgrades. To the best of PGE's knowledge, after reasonable inquiry, PGE has no information on the exact quantities of oil or routine maintenance waste removed from the Willbridge Substation.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate any documents indicating the quantity of construction debris (cement) removed in 2001.</p> <p>Soil and gravel removed during excavations (from upgrades or equipment spill response) are tested and disposed of appropriately. These are generally transported directly from the site to the disposal facility or to Wilsonville/PSC, depending on concentration of PCB/petroleum hydrocarbon-contamination.</p> <p>For further waste documentation/information, see the responses to Questions 21a through 21c. Also see the waste and materials documentation provided in the separate 104(e) response for the Harborton Substation, which was historically a waste and material handling facility and is within the Investigation Area, and the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7).</p>	
<p>22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or</p>	<p>Not applicable. The Willbridge Substation is not located adjacent to the Willamette River.</p>	

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materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.		
23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.	Not applicable. The Willbridge Substation does not have any over-water structures.	
24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.	Not applicable. There are no leased aquatic lands at the Willbridge Substation.	
25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 to the present). Provide the brand name of all pesticides or herbicides used.	<p>Several herbicides have been used at the Willbridge Substation to control vegetation growth. From 1992 through 2007, one or more herbicides (i.e., Krovar, Telar, Diuron, Oust, Pendulum, Landmark, Portfolio, and/or Garlon 4) were used at the Willbridge Substation. To the best of PGE's knowledge, after reasonable inquiry, the following are the quantities applied (when applied):</p> <ul style="list-style-type: none"> <li>• Krovar – 9-10 lbs per acre</li> <li>• Telar – 2-3 oz per acre</li> <li>• Diuron – 4-8 lbs per acre</li> <li>• Oust – 3-4 oz per acre</li> <li>• Pendulum – 5 lbs per acre</li> </ul>	Question 25 Attachment Q25_Willbridge Sub Herb Application History.pdf



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	<ul style="list-style-type: none"> <li>• Landmark – 4.5 oz per acre</li> <li>• Portfolio – 4 oz per acre</li> <li>• Garlon 4 – as needed for spot brush control</li> </ul> <p>See the attached document for further details on the known herbicide application history.</p>	
<p>26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.</p>	<p>No waste or materials are stored onsite. Wastes and used materials from within the Investigation Area are either transported directly to the appropriate disposal facility or transported to a PGE waste and material handling facility for interim storage prior to disposal/recycling/destruction. Historically, PGE's waste and material handling facilities were Harborton Substation, Sellwood Substation, PSC, or Wilsonville (only soil/gravel with &lt; 50 ppm PCBs). Currently, PGE's waste and material handling facilities are PSC and Wilsonville (only soil/gravel with &lt; 50 ppm PCBs).</p> <p>For further waste information, see the response and documents for Questions 21 and 52.</p>	<p>See all Question 21 Attachments</p> <p>Also see all Question 52 Attachment</p>
<p>27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:</p>	<p>To the best of PGE's knowledge, after reasonable inquiry, waste and materials were not disposed of at the Willbridge Substation. To the best of PGE's knowledge, after reasonable inquiry, no wastes were disposed into the Willamette River.</p>	
<p>a. the persons with whom the Respondent made such arrangements;</p>	<p>In general, waste and used material from within the Investigation Area are either transported directly to the appropriate disposal facility or transported to a PGE waste and material handling facility for interim storage prior to disposal/recycling/destruction. Historically, PGE's waste and material handling facilities were Harborton Substation, Sellwood Substation, PSC, or Wilsonville (only soil/gravel with &lt; 50 ppm PCBs). Currently, PGE's waste and material handling facilities are PSC and Wilsonville (only soil/gravel with &lt; 50 ppm PCBs). The Harborton Substation is within the Investigation Area and is addressed in a separate 104(e) response.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, companies/persons with whom PGE has made arrangements for disposal/recycling/destruction of wastes and/or used material for PGE properties in Oregon are listed in the document (Q40_Waste-Materials Receivers and Carriers.pdf) attached in response to Question 40. To the best of PGE's knowledge, after reasonable inquiry, those companies currently used are listed in the document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a. Of those listed in the document (Q40_Waste-Materials Receivers and Carriers.pdf) attached in response to Question 40, those companies within the Investigation Area are summarized in the attached document</p>	<p>See Question 27 Attachment Q27_Waste-Materials Receivers within IA.pdf</p> <p>Also see Question 40 Attachment Q40_Waste-Materials Receivers and Carriers.pdf</p> <p>Also see all Question 21 Attachments</p> <p>Also see all Question 52 Attachments</p>

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	<p>(Q27_Waste-Materials Receivers within IA.pdf) and include the following:</p> <ul style="list-style-type: none"> <li>• Acme Trading &amp; Supply – located at 4927 NW Front Ave, Portland, OR</li> <li>• AGG Enterprises Inc. – located at 555 N Channel Ave, Portland, OR</li> <li>• Ash Grove Cement Company – located at 13939 N Rivergate Blvd, Portland, OR</li> <li>• Bingham Willamette (now Sulzer Pumps) – located at 2800 NW Front Ave, Portland, OR</li> <li>• Calbag Metals – located at 2495 NW Nicolai St and 12005 N Burgard Way, Portland, OR</li> <li>• Cascade General Inc – located at 5555 N Channel Rd, Portland, OR</li> <li>• General Electric Company – located at 2535 NW 28<sup>th</sup> Ave, Portland, OR</li> <li>• Northwest Natural Gas Co – located at 123 NW Flanders, Portland, OR</li> <li>• Nudleman &amp; Sons – located at 2707 NW Nela, Portland, OR</li> <li>• Oregon Hydrocarbon/TPS Technologies – located at 9333 N Harborage St, Portland, OR</li> <li>• Port of Portland – located at 121 NW Everett Street, Portland, OR</li> <li>• Schnitzer Steel – located at 3200 NW Yeon Ave and 12005 N Burgard Way, Portland, OR</li> <li>• Tyee Construction Company of Oregon – located at 12005 Burgard Way, Portland, OR</li> <li>• Univar – located at 3950 NW Yeon Ave and 10821 N Lombard St, Portland, OR</li> <li>• Western Steel Cast – located at 3070 SW Moody, Portland, OR</li> </ul> <p>To the best of PGE’s knowledge, after reasonable inquiry, none of the companies listed above have been identified as having directly received waste from Willbridge Substation based on the response and documents attached for Questions 21 and 52.</p> <p>Although there is no indication that the companies/persons listed above have directly received wastes from the Willbridge Substation, because these companies have historically received or currently receive waste and/or used materials from the PGE waste and material handling facilities they may have received waste and/or used material from the Willbridge Substation. General Electric Company was used as a transformer transfer facility by PGE. It is unknown whether any Willbridge Substation equipment went through this facility.</p> <p>The Harborton Substation, a historical PGE waste and materials handling facility, is within the Investigation Area and is addressed in a separate 104(e) response. Also see the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7).</p>	
<p>b. every date on which Respondent made such arrangements;</p>	<p>To the best of PGE’s knowledge, after reasonable inquiry, none of the companies listed in response to Question 27a have been identified as having directly received waste from the Willbridge Substation based on the response and documents attached for Questions 21 and 52.</p> <p>Available general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling are provided in the Harborton Substation 104(e) response, the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from</p>	<p>See all Question 21 Attachments</p> <p>Also see all Question 52 Attachments</p>

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<p>c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all materials involved in each such arrangement;</p>	<p>the Willbridge Substation (Supplemental Submittal S7), and the supplemental submittal of general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling (Supplemental Submittal S6).</p> <p>Historically, used oil and maintenance waste (including petroleum hydrocarbon and/or PCB contaminated waste) were transported to Harborton Substation, Sellwood Substation, or PSC for interim storage prior to disposal or recycling. Currently, used oil and maintenance waste are transported to PSC for interim storage prior to disposal or recycling. The amount of waste generated during substation operations associated with equipment maintenance varied between substations/properties. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know the exact quantities/characteristics of oil or routine maintenance waste removed from the substations/properties. The Harborton Substation is within the Investigation Area and is discussed in a separate 104(e) response. Also see the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7).</p> <p>To the best of PGE's knowledge, after reasonable inquiry, disposal/recycling facilities with which PGE has made arrangements for disposal/recycling of wastes for PGE properties in Oregon are listed in the document (Q40_Waste-Materials Receivers and Carriers.pdf) attached in response to Question 40. The document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a summarizes the current various waste stream types, the current initial carrier, the current interim storage (if applicable), the current secondary carrier (if applicable), and the current disposal/recycling facility. Of those listed, the following is a description of the waste and used material disposed/recycled at facilities within the Investigation Area:</p> <ul style="list-style-type: none"> <li>• Acme Trading &amp; Supply – Used (but not obsolete) transformers (solid) and ballasts (solid)</li> <li>• AGG Enterprises Inc. – Mixed non-hazardous waste (various) and recyclables</li> <li>• Ash Grove Cement Company – PCB waste: oil (liquid) with PCBs &lt; 50 ppm</li> <li>• Bingham Willamette (now Sulzer Pumps) – Used (but not obsolete) transformers (solid) and oil circuit breakers (solid)</li> <li>• Calbag Metals – Scrap metal (solid) and empty aerosol cans (solid)</li> <li>• Cascade General Inc – Non-hazardous liquid waste/material: mineral oil (liquid) with PCBs &lt; 50 ppm</li> <li>• General Electric Company – Oil with PCBs ≥ 50 ppm (liquid) and obsolete equipment (solid) with trace amounts of PCBs ≥ 50 ppm Used (but not obsolete) transformers (solid)</li> <li>• Northwest Natural Gas Co – Transformer oil (liquid)</li> <li>• Nudleman &amp; Sons – Scrap copper (solid)</li> <li>• Oregon Hydrocarbon/TPS Technologies – Solidified contents of USTs (solid) and petroleum hydrocarbon-contaminated soil (solid)</li> <li>• Port of Portland – Used (but not obsolete) transformers (solid) and ballasts (solid)</li> <li>• Schnitzer Steel – Scrap metal (solid) and empty aerosol cans (solid)</li> <li>• Tyee Construction Company of Oregon – Transformers (solid)</li> <li>• Univar – Used transformer/insulating oil (liquid, &lt;1 ppm PCBs), used rags/absorbent</li> </ul>	<p>See all Question 15 Attachments</p> <p>Also see Question 21 Attachment Q21a_Waste Stream Summary.pdf</p> <p>Also see Question 40 Attachment Q40_Waste-Materials Receivers and Carriers.pdf</p>

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	<p>material from leaks or spills (solid, &lt;5 ppm PCBs), and used transformer/insulating oil (liquid, ≥ 50 ppm PCBs)</p> <ul style="list-style-type: none"> <li>Western Steel Cast – Transformers (solid)</li> </ul> <p>To the best of PGE's knowledge, after reasonable inquiry, none of the companies listed above have directly received waste from the Willbridge Substation based on the response and documents attached for Questions 21 and 52.</p> <p>The companies/persons listed above have historically received or currently receive waste and/or used materials from the PGE waste and material handling facilities, which may have included waste and/or used material from the Willbridge Substation. The Harborton Substation, a historical PGE waste and materials handling facility, is within the Investigation Area and is addressed in a separate 104(e) response. Also see the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7).</p>	
d. in general terms, the nature and quantity of the non- hazardous materials involved in each such arrangement;	See the response to Question 27c.	
e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;	See the response to Question 27c.	
f. the owner of the materials involved in each such arrangement, if not Respondent;	Not applicable.	
g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;	See the response to Question 27c.	
h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;	See the response to Question 27a.	
i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;	See the response to Question 27a.	
j. who selected the location to which the materials were to be disposed or treated;	PGE personnel in charge of environmental matters and consultants. See the response and documents attached for Question 38, as well as the documents attached in response to Question 6g.	<p>See all Question 38 Attachments</p> <p>Also see Question 6 Attachments Q06g_Bullseye articles.pdf</p>

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		Q06g_Organizational Charts.pdf Q06g_Distribution and System Planning Information.pdf Q06g_HRIC Structure Report 2008.pdf Q06g_HRIC Structure Info 1982-2007.pdf
k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and	PGE personnel in charge of environmental matters and consultants. See the response and documents attached for Question 38, as well as the documents attached in response to Question 6g.	See all Question 38 Attachments  Also see Question 6 Attachments Q06g_Bullseye articles.pdf Q06g_Organizational Charts.pdf Q06g_Distribution and System Planning Information.pdf Q06g_HRIC Structure Report 2008.pdf Q06g_HRIC Structure Info 1982-2007.pdf
l. any records of such arrangement and each shipment.	See the response to Question 27c.	
28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).	Willbridge Substation Buildings / Structures include: <ul style="list-style-type: none"> <li>Control building – 12 ft x 15 ft prefabricated, steel panel construction, single level building.</li> <li>Transmission structure – open frame structural steel supporting 115kv bus.</li> <li>Distribution structure – open frame structural steel supporting 13kv bus.</li> <li>Capacitor racks – open frame structural steel supporting station capacitors and associated equipment.</li> </ul> For further details, see the response to Question 13d.	
29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.	Historical operations on this property include electrical equipment footing replacement, power distribution (unmanned), equipment maintenance, and equipment decommissioning, as needed.  Current operations on this property are limited to equipment installation, power distribution (unmanned), equipment maintenance, and equipment decommissioning, as needed.  See the attached documents.	Question 29 Attachments Q29_Substation Lifecycle.pdf Q29_Operations-Waste Schematic.pdf
30. Provide a brief description of the nature of Respondent's operations at each location on each Property including:		
a. the date such operations commenced and concluded; and	The Willbridge Substation (Parcel A-Sub) was acquired from Pacific Power & Light Company (now PacifiCorp) on 6 December 1973. Pacific Power & Light Company (now PacifiCorp) operated the parcel (Parcel A-Sub) as a substation for a number of years before it was transferred to PGE. Operation of the Willbridge Substation by PGE commenced in 1973 and	

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<p>b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each</p>	<p>continues to the present.</p> <p>Equipment maintenance activities: Maintenance of equipment, generation of maintenance waste, disposal of maintenance waste, and removal of obsolete equipment.</p> <p>Construction activities: Excavation, assembly/installing equipment, welding, painting, and wiring.</p> <p>Substation activities (1973-present): Power distribution, operation of equipment, routine maintenance, cleaning, inspection of equipment, minor painting, transfer of oil from supply tanks to equipment, transfer of oil between equipment and temporary storage tanks, renewal of lubricants and various consumable fluids, reconfiguration of equipment, upgrade of equipment components, and testing and calibration of equipment.</p> <p>See the documents attached in response to Question 29, as well as the responses to Questions 5g, 13d, and 13k.</p>	<p>See all Question 29 Attachments</p>
<p>31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.</p>	<p>See responses provided for Questions 5d, 13d, and 13k.</p>	
<p>32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.</p>	<p>Substation activities: No raw materials are/were used in the operation of the substation. No products are/were manufactured, recycled, recovered, treated, or processed during operation.</p>	
<p>33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.</p>	<p>The products/materials currently used at PGE properties within Oregon and potentially used at the Willbridge Substation are listed in the attached document (Q33_EMC List.pdf). Material Safety Data Sheets (MSDS) for these products/materials are provided in a supplemental submittal (Supplemental Submittal S2). Products/materials used in the past are similar to those used currently.</p>	<p>Question 33 Attachment Q33_EMC List.pdf</p>
<p>34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:</p>	<p>Substation Maintenance Activities: Routine visual inspections are performed once a month on most of the electrical equipment, including transformers, breakers, switches, regulators, motor operators, meters &amp; relays, and batteries. Lighting systems are visually inspected and operation tests are performed once a month. Inspection of the control systems are performed as needed.</p> <p>Substation Cleaning Activities: Cleaning of electrical equipment varies. Large transformers are</p>	<p>Question 34 Attachment Q34_Maintenance Activities.pdf</p> <p>Also see Question 21 Attachment Q21a_Waste Stream Summary.pdf</p> <p>Also see all Question 29 Attachments</p>

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	<p>cleaned annually, breakers are cleaned based on the number of operations and time since the last inspection, switches are cleaned as needed, insulators are cleaned during scheduled outages, regulators are cleaned or replaced as needed, meters and relays are cleaned during routine calibration, batteries are cleaned approximately twice a year, and the non-electrical surfaces of control systems are cleaned during major construction.</p> <p>Please see the attached cleaning and maintenance activities document (Q34_Maintenance Activities.pdf) for further details, as well as the response and documents for Question 29, and the document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a.</p>	
a. the types of materials used to clean/maintain this equipment-machinery;	The primary materials that may have been used for equipment maintenance include transformer oil, solvents, denatured alcohol, degreasers, lubricating grease, hydraulic fluid, and paint.	
b. the monthly or annual quantity of each such material used.	The materials used for equipment maintenance are/were not stored onsite, but are brought to the site as needed. To the best of PGE's knowledge, after reasonable inquiry, no detailed logs of exact quantities of maintenance materials used or oil/routine maintenance waste removed from the substations/properties are available.	
c. the types of materials spilled in Respondent's operations;	Materials potentially spilled during operations include oil and fluid from equipment spills or leaks.	
d. the materials used to clean up those spills;	<p>The following are PGE general spill response procedures.</p> <ul style="list-style-type: none"> <li>• Minor equipment spills or leaks are cleaned up using sorbent materials.</li> <li>• Major spills are cleaned up using sorbent materials, berms, and necessary equipment.</li> </ul> <p>For further details, see the responses and documents for Question 19 and the response and documents (Q21a_Waste Stream Summary.pdf and Q21c_Cleaning Up Small Mercury Spills 2008.pdf) for Question 21. The mercury spill cleanup guide is a general PGE guidance and does not imply that mercury spills have ever occurred at the Willbridge Substation.</p>	<p>See all Question 19 Attachments</p> <p>Also see Question 21 Attachments Q21a_Waste Stream Summary.pdf Q21c_Cleaning Up Small Mercury Spills 2008.pdf</p>
e. the methods used to clean up those spills; and	<p>Minor equipment spills or leaks are cleaned up as needed by wiping up the oil/fluid with on-hand absorbent materials.</p> <p>Major spills are immediately reported to the System Control Center. PGE's spill response crew is dispatched to clean up the oil. Soiled material is placed into a marked barrel and disposed of properly. For further details, see the responses and documents for Question 19 and the response and documents (Q21a_Waste Stream Summary.pdf and Q21c_Cleaning Up Small Mercury Spills 2008.pdf) for Question 21. The mercury spill cleanup guide is a general PGE guidance and does not imply that mercury spills have ever occurred at the Willbridge Substation.</p>	<p>See all Question 19 Attachments</p> <p>Also see Question 21 Attachments Q21a_Waste Stream Summary.pdf Q21c_Cleaning Up Small Mercury Spills 2008.pdf</p>
f. where the materials used to clean up those spills were disposed of.	<p>Materials potentially contaminated with PCBs are sealed in barrels and transferred to PGE's waste and material handling facility (historically at Harborton Substation, Sellwood Substation, or PSC; currently at PSC). If not ascertainable from testing the equipment generating the spill, these wastes are tested to determine a disposal location appropriate for its PCB concentration once they are received at the waste and material handling facility.</p> <p>Materials containing PCBs are disposed at different facilities depending on the concentration of</p>	See all Question 21 Attachments



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	the originally spilled materials, if known, or the concentration in the waste materials. Wastes not contaminated with PCBs are containerized separately and transferred to PGE's waste and material handling facility (historically at Harborton Substation, Sellwood Substation, or PSC; currently at PSC). For further details, see the response and documents for Question 21.	
35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.	<p>Minor spills or leaks are cleaned up as they occur. The fluid is wiped up with on-hand absorbent materials. Major spills are immediately reported to the PGE System Control Center. PGE's spill response crew is dispatched to clean up the oil. Soiled material is placed into a marked barrel and disposed of properly.</p> <p>For further details, see the responses and documents for Question 19 and the response and documents (Q21a_Waste Stream Summary.pdf and Q21c_Cleaning Up Small Mercury Spills 2008.pdf) for Question 21. The mercury spill cleanup guide is a general PGE guidance and does not imply that mercury spills have ever occurred at the Willbridge Substation.</p>	<p>See all Question 19 Attachments</p> <p>Also see Question 21 Attachments Q21a_Waste Stream Summary.pdf Q21c_Cleaning Up Small Mercury Spills 2008.pdf</p>
<p>36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:</p> <p>a. its physical state;</p> <p>b. its nature and chemical composition;</p> <p>c. its color;</p> <p>d. its odor.</p> <p>e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and</p> <p>f. the dates (beginning &amp; ending) during which each type of waste was produced by Respondent's operations.</p>	<p>PGE operational waste varies month to month and year to year. The following is a summary of the type of wastes generated from the historical and current operations at the Willbridge Substation.</p> <p>Remediation waste includes:</p> <ul style="list-style-type: none"> <li>• Soil and gravel contaminated with PCBs and petroleum hydrocarbons – solid, petroleum hydrocarbon- and PCB-contaminated soil and gravel, grey/black, petroleum hydrocarbon odor, two cubic feet, August 2005; see the document (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62.</li> </ul> <p>General materials/wastes potentially contaminated with PCBs include:</p> <ul style="list-style-type: none"> <li>• Used/excess lubricants, oils, and other fluids – liquid, petroleum hydrocarbons, various, petroleum hydrocarbon odor, unknown, 1973-present</li> <li>• Obsolete equipment (e.g., transformers, capacitors) – solid, metal, metallic/petroleum hydrocarbon odor, unknown, 1973-present</li> <li>• Rags used to clean equipment – solid, fabric material, various, alcohol-petroleum hydrocarbon odor, unknown, 1973-present</li> <li>• Absorbents used to clean up leaks or spills – solid, absorbent material, various, petroleum hydrocarbon odor, unknown, 1973-present</li> <li>• Ballasts – solid, metallic, electrical lamp component, various, no odor, unknown, 1973-present</li> <li>• Soils removed in response to spills or leaks – solid, petroleum hydrocarbon- and PCB-contaminated soil, black, petroleum hydrocarbon-sweet odor, unknown, 1973-present</li> </ul> <p>General materials/wastes not contaminated with PCBs include:</p> <ul style="list-style-type: none"> <li>• Solvents – liquid, oil-based chemical solvents, petroleum hydrocarbon smell, unknown quantity, 1973-present</li> <li>• Batteries – solid, alkaline/zinc-carbon/lithium-based batteries, no odor, unknown quantity,</li> </ul>	<p>See all Question 21 Attachments</p> <p>Also see Question 33 Attachment Q33_EMC List.pdf</p> <p>Also see Question 62 Attachment Q62_Willbridge Spill Report 8-8-05.pdf</p>

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	<p>1973-present</p> <ul style="list-style-type: none"> <li>• Scrap metal – solid, metallic (e.g., steel), none to metallic odor, unknown quantity, 1973-present</li> <li>• Light bulbs – solid, incandescent and fluorescent light bulbs, no odor, unknown quantity, 1973-present</li> <li>• General garbage – mixed composition, various colors, various odors, unknown quantity, 1973-present</li> <li>• Construction debris – mixed composition, various colors, various odors, unknown quantity, 1973-present</li> <li>• Soils removed during excavation for equipment/building demolition/installation – solid, soil, brown, organic odor, unknown, 1973-present</li> </ul> <p>Also see the MSDS documents provided in a supplemental submittal (Supplemental Submittal S2), and the responses and documents for Question 21. Also see the document (Q33_EMC List.pdf) attached in response to Question 33. Also see the separate 104(e) response for the Harborton Substation (historically at PGE waste and used material handling facility) and the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7).</p>	
<p>37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.</p>	<p>See the response and documents for Question 29, as well as the document (Q21a_Waste Stream Summary) attached in response to Question 21a.</p>	<p>See all Question 29 Attachments</p> <p>Also see Question 21 Attachment Q21a_Waste Stream Summary</p>
<p>38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such</p>	<p>See the attached documents for a listing of those responsible for environmental matters 1980 - present. See the attached 1993 and 1997 Job Descriptions for Environmental Services Manager. See the attached document for management structural information 1982-2008.</p> <p>Also see the documents attached in response to Question 6g.</p>	<p>Question 38 Attachments</p> <p>Q38_Res. For Environmental Matters.pdf Q38_Mgr. Env. Svc. Job description – 1993.pdf Q38_Mgr. Env. Svc. Job description – 1997.pdf Q38_HRIS Structure Info. 1982-2008-4.0.pdf</p> <p>Also see Question 6 Attachments</p> <p>Q06g_Bullseye articles.pdf Q06g_Organizational Charts.pdf Q06g_Distribution and System Planning Information.pdf Q06g_HRIC Structure Report 2008.pdf Q06g_HRIS Structure Info 1982-2007.pdf</p>

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individuals concerning Respondent's waste management.		
39. For each type of waste describe Respondent's contracts, agreements or other arrangements for its disposal, treatment, or recycling.	<p>In general terms, waste and used material was historically either transferred directly to the disposal facility, or to one of the following PGE waste and used material handling facilities for interim storage: Harborton Substation, Sellwood Substation, PSC, or Wilsonville (only soil/gravel with &lt; 50 ppm PCBs). Currently, in general terms, waste and used materials are either transferred directly to the disposal facility or to one of the following PGE waste and used material handling facilities: PSC or Wilsonville (only soil/gravel with &lt; 50 ppm PCBs).</p> <p>To the best of PGE's knowledge, after reasonable inquiry, there are no contracts, agreements, or other arrangements for disposal, treatment, or recycling for this specific facility. Waste disposal permits are attached in response to Question 52. General PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling are provided in the Harborton Substation 104(e) response, the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7), and the supplemental submittal of general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling (Supplemental Submittal S6).</p>	See all Question 52 Attachments
<p>40. Provide copies of such contracts and other documents reflecting such agreements or arrangements, including but not limited to:</p> <p>a. state where Respondent sent each type of its waste for disposal, treatment, or recycling;</p> <p>b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);</p> <p>c. if Respondent transported any of its wastes away from its operations, please so indicate;</p> <p>d. for each type of waste specify which Waste Carrier picked it up;</p>	<p>In general terms, waste and used material was historically either transferred directly to the disposal facility or to one of the following PGE waste and used material handling facilities for interim storage: Harborton Substation, Sellwood Substation, PSC, or Wilsonville (only soil/gravel with &lt; 50 ppm PCBs). Currently, in general terms, waste and used materials are either transferred directly to the disposal facility or to one of the following PGE waste and used material handling facilities: PSC or Wilsonville (only soil/gravel with &lt; 50 ppm PCBs).</p> <p>To the best of PGE's knowledge, after reasonable inquiry, those companies/persons with whom PGE currently has arrangements for disposal/recycling/destruction of wastes and/or used material are listed in the document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a. The document summarizes the current various waste stream types, the current initial carrier, the current interim storage (if applicable), the current secondary carrier (if applicable), and the current disposal facility. To the best of PGE's knowledge, after reasonable inquiry, all companies/persons with whom PGE has made arrangements for disposal/recycling/destruction of wastes and/or used material for PGE properties in Oregon are listed in the attached document (Q40_Waste-Materials Receivers and Carriers.pdf).</p> <p>The following describes the current waste and used material arrangements at PSC, which would have been similar to the historic waste arrangements at Harborton Substation, Sellwood Substation, and PSC (although it is likely that different contractors/service providers were historically utilized):</p>	<p>Question 40 Attachment Q40_Waste-Materials Receivers and Carriers.pdf</p> <p>Also see Question 21 Attachment Q21a_Waste Stream Summary.pdf</p> <p>Also see Question 27 Attachment Q27_Waste-Materials Receivers within IA.pdf</p> <p>Also see all Question 52 Attachments</p>

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<p>e. indicate the ultimate disposal/recycling/treatment location for each type of waste.</p> <p>f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and</p> <p>g. state the basis for and provide any documents supporting the answer to the previous question.</p>	<ul style="list-style-type: none"> <li>Earth Protection Services, Inc. (EPSI) recycles the variety of recyclable waste and used materials from the PSC (i.e., ballasts, batteries, and mercury containing articles). New empty containers are exchanged for the filled containers. If there are any concerns about the integrity of the new containers or any other concerns, PGE's Environmental Services (which processes all EPSI invoices) is called to ensure that the vendor promptly corrects the problem. EPSI is a nationally recognized recycling vendor.</li> <li>Used transformer/insulating oil (&lt; 1 ppm PCBs) is recycled in house by PGE or by Univar USA Inc.. Univar also picks up and transports used transformer/insulating oil (≥ 50 ppm PCBs) to either Clean Harbors Deer Park or to Clean Harbors Aragonite. In addition, Univar picks up and transports used rags and absorbent material (≥ 50 ppm PCBs) to Arlington Landfill.</li> <li>Used rags and absorbent material (1 to 50 ppm PCBs) is picked up by NRC Environmental Services and transported to Columbia Ridge Landfill.</li> <li>Used transformer/insulating oil (1 to 50 ppm PCBs) is picked up by Transformer Technologies and is incinerated by Transformer Technologies or recycled at Environmental Management of Kansas City.</li> <li>Non-PCB containing used oil (e.g., hydraulic fluids, compressor oil, and motor oil), used oil filters, and used antifreeze from the maintenance shop are collected in labeled 55-gallon drums and recycled or used for energy recovery by Thermo Fluids.</li> <li>All parts washers are maintained under license by Safety Kleen which performs monthly service calls. Safety Kleen recycles all used non-hazardous solvents and brake solution, processing the solvent and brake solution for reuse.</li> <li>Aerosol can drainings are collected in industry standard aerosol can puncturing devices. At PSC, punctured cans are recycled by CalBag Metals Recycling (non-ferrous metal) or Schnitzer Steel (ferrous metal). When the drums are near full, they are sampled by a licensed laboratory to help characterize the waste prior to collection. Other non-PCB-contaminated scrap metal is also recycled by CalBag Metals Recycling (non-ferrous metal) or Schnitzer Steel (ferrous metal).</li> <li>Hazardous solvents and paint drainings from aerosol cans are picked up by Veolia Environmental Services and incinerated at Veolia Es Technical Solutions.</li> <li>Non-PCB-contaminated used equipment parts (e.g., gaskets, hoses, and air filters), auto parts (brake pads, belts, and air filters), and general trash are picked up by waste management and transported to various waste management landfills.</li> <li>Oil-filled obsolete transformers and other electrical equipment (&lt; 50 ppm PCBs) are</li> </ul>	

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	<p>transported to Transformer Technologies. Oil-filled obsolete transformers and other electrical equipment (<math>\geq 50</math> ppm PCBs) are sent to either Clean Harbors Deer Park or Clean Harbors Argonite for incineration. Oil-filled ballasts (<math>&gt; 1</math> ppm PCBs) are sent to Arlington Landfill or Clean Harbors Deer Park.</p> <ul style="list-style-type: none"> <li>• Drained obsolete equipment (<math>&lt; 50</math> ppm PCBs) is recycled by Coleman Metals and drained obsolete equipment (50 to 500 ppm PCBs) is disposed of at Arlington Landfill.</li> </ul> <p>Soil and gravel removed during excavations (from upgrades, spill response, or remediation) is tested and disposed of appropriately. The soil and gravel are either transported directly from the site to the disposal facility or are transported to Wilsonville (only soil/gravel with <math>&lt; 50</math> ppm PCBs) and/or PSC for interim storage before bulk disposal at a location dependant upon PCB-content.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, there are no contracts, agreements, or other arrangements for disposal, treatment, or recycling for this specific facility. Waste disposal permits are attached in response to Question 52. Also see the response and document attached in response to Question 27. General PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling are provided in the Harborton Substation 104(e) response (historically a PGE waste and material handling facility within the Investigation Area), the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7), and the supplemental submittal of general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling (Supplemental Submittal S6).</p>	
<p>41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:</p> <p>a. the nature and chemical composition of each type of waste;</p> <p>b. the dates on which those wastes were disposed;</p> <p>c. the approximate quantity of those wastes disposed by month and year;</p> <p>d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre-treatment plant, Publicly Owned Treatment Works (POTW), etc.); and</p> <p>e. whether and what pretreatment</p>	<p>To the best of PGE's knowledge, after reasonable inquiry, other than stormwater tile drains, no drains are/were present at the Willbridge Substation. To the best of PGE's knowledge, after reasonable inquiry, no wastes are/were disposed of into the stormwater tile drains at the Willbridge Substation. There are no treatment/pretreatment facilities at the Willbridge Substation.</p>	

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was provided.		
42. Identify any sewage authority or treatment works to which Respondent's waste was sent.	To the best of PGE's knowledge, after reasonable inquiry, there is/was no sewage authority or treatment works to which the Willbridge Substation waste was sent.	
43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.	To the best of PGE's knowledge, after reasonable inquiry, there are/were no settling tanks, septic systems, or pretreatment system sludges or other treatment wastes resulting from operations at the Willbridge Substation.	
44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, PGE did not engage in ship building, retrofitting, maintenance, or repair activities at the Willbridge Substation.	
45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, PGE did not engage in ship building, retrofitting, maintenance, or repair activities at the Willbridge Substation.	
46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, PGE did not engage in ship building, retrofitting, maintenance, or repair activities at the Willbridge Substation.	

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<p>47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.</p>	<p>In general, PGE replaces PCB-containing or potentially PCB-containing equipment (e.g., transformers, capacitors, lamp ballasts, circuit breakers, bushings, and step regulators) with non-PCB oil containing equipment (&lt; 50 ppm PCBs) as they are removed from service. The primary materials that may have been used for equipment maintenance include dielectric fluids (oil) and transformer oil, which may have historically contained PCBs. To the best of PGE's knowledge, after reasonable inquiry, other than minor repairs, electrical equipment maintenance was generally not performed on site. Instead, equipment was taken out of service and transported to PGE's waste and material handling facility for repairs and retrofitting.</p> <p>See the document (Q21a_Willbridge Oil-Filled Equipment.pdf) attached in response to Question 21a for the list of oil-filled substation equipment currently at the Willbridge Substation. The document identifies the position, serial number, year manufactured, detected PCB concentrations and the date tested for PCBs, and oil volume of oil-filled equipment at the Willbridge Substation. See the document (Q21a_1986_Oil Filled Equipment.pdf) attached in response to Question 21a for a list of oil-filled equipment located at the Willbridge Substation in 1986.</p> <p>On 8 August 2005, two cubic feet of soil and gravel with 12 ppm PCBs was removed as a result of a transformer leak; see the document (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62.</p> <p>See the documents attached in response to Question 29. Also see the annual PCB reports (1978-2007) for PGE (all PGE sites combined), which are provided in a supplemental submittal (Supplemental Submittal S3). The 2008 annual PCB report is not included in the supplemental submittal because it has not yet been completed.</p>	<p>See Question 21 Attachment Q21a_Waste Stream Summary.pdf Q21a_Willbridge Oil-Filled Equipment.pdf Q21a_1986_Oil Filled Equipment.pdf</p> <p>Also see Question 29 Attachments Q29_Substation Lifecycle.pdf Q29_Operations-Waste Schematic.pdf</p> <p>Also see Question 62 Attachment Q62_Willbridge Spill Report 8-8-05.pdf</p>
<p>48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.</p>		
<p>a. the manufacturer and serial number of each transformer;</p>	<p>Electrical equipment was already installed at the Willbridge Substation when it was acquired in 1973. Since that time, some equipment has been upgraded or replaced. The substation remains in use today.</p>	
<p>b. the quantity of oil in each transformer;</p>		
<p>c. the concentrations of PCB contained in the transformer oil;</p>		
<p>d. the time period or periods in which these transformers were sent to the</p>	<p>See the document (Q21a_Willbridge Oil-Filled Equipment.pdf) attached in response to Question 21a for the list of oil-filled substation equipment currently at the Willbridge Substation. The document identifies the position of the oil filled equipment, the serial number of the equipment, the year manufactured, the detected PCB concentrations, the test date for PCBs, and the total volume of oil. See the document (Q21a_1986_Oil Filled Equipment.pdf) attached in response to Question 21a for a list of oil-filled equipment located at the Willbridge Substation in 1986.</p>	<p>See Question 21 Attachments Q21a_Willbridge Oil-Filled Equipment.pdf Q21a_1986_Oil Filled Equipment.pdf</p>



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<p>Property;</p> <p>e. details about how each transformer was handled or stored or otherwise processed;</p>	<p>Equipment is handled by trained qualified personnel. Equipment is energized and in service.</p> <p>Obsolete equipment is drained prior to disposal/recycling, if possible. Drained oil is incinerated or recycled, depending on its PCB content. Obsolete equipment may be transferred to a PGE waste and used materials handling facility for interim storage prior to disposal/recycling. The obsolete equipment is incinerated, landfill disposed, or recycled based on PCB content and structural composition. See the document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a.</p> <p>Some used, but not obsolete, transformers have been sold to other companies/persons. These are documented in the Supplemental Submittal S7 (documentation from facilities that may have received waste and materials from properties within the Investigation Area).</p> <p>For further information, see the response to Questions 21, 27, and 40. Also see the separate 104(e) response for the Harborton Substation, which was also historically a PGE waste and material handling facility and the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7).</p>	<p>See Question 21 Attachment Q21a_Waste Stream Summary.pdf</p>
<p>f. information describing the contractual relationship Respondent had, if any, with owners or users of the respective transformers, including but not limited to, liability for disposal;</p>	<p>Not applicable. Equipment is owned by PGE.</p>	
<p>g. information on any other oil filled electrical equipment at the Property, and;</p>	<p>See the document attached in response to Question 21a (Q21a_2008_Oil Filled Equipment.pdf), which lists the current oil-filled equipment at the Willbridge Substation. Also see the document (Q21a_1986_Oil Filled Equipment.pdf) attached in response to Question 21a for a list of oil-filled equipment located at the Willbridge Substation in 1986.</p>	<p>See Question 21 Attachments Q21a_Willbridge Oil-Filled Equipment.pdf Q21a_1986_Oil Filled Equipment.pdf</p>
<p>h. complete copies of any contracts, invoices, receipts, or other documents related to the transformers or other oil filled electrical equipment to the Property.</p>	<p>To the best of PGE's knowledge, after reasonable inquiry, there are no available contracts, agreements, or other arrangements for disposal, treatment, or recycling for this specific facility. Waste disposal permits are attached in response to Question 52.</p> <p>Additional available general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling are provided in the Harborton Substation 104(e) response, the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7), and the supplemental submittal of general PGE contracts, agreements, or other arrangements for disposal, treatment, or recycling (Supplemental Submittal S6).</p>	<p>See all Question 52 Attachments</p>
<p>49. For each process or activity identified in response to the previous two</p>	<p>See the document (Q21a_Willbridge Oil-Filled Equipment.pdf) attached in response to Question 21a, which lists the current oil-filled equipment at the Willbridge Substation, including the position of the equipment. Also see the document (Q21a_1986_Oil Filled Equipment.pdf)</p>	<p>See Question 21 Attachments Q21a_Willbridge Oil-Filled Equipment.pdf Q21a_1986_Oil Filled Equipment.pdf</p>

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Questions, identify the location of the process or activity on the Property.	<p>attached in response to Question 21a for a list of oil-filled equipment located at the Willbridge Substation in 1986. To the best of PGE's knowledge, after reasonable inquiry, PGE is not aware of any other processes or activities on the property, either currently or historically.</p> <p>Also see the document (Q04a_2000 Willbridge Substation Layout.pdf) attached in response to Question 4, which shows the location of oil filled equipment.</p>	Also see Question 4 Attachment Q04a_2000 Willbridge Substation Layout.pdf (CEII <sup>1</sup> )
<b>Section 5.0 - Regulatory Information</b>		
<p>50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.</p>	<p>The primary federal, state and local agencies that have regulated PGE at the Willbridge Substation include:</p> <ul style="list-style-type: none"> <li>• City of Portland (including fire, medical, and police): building safety inspections, neighborhood inspections, facility enhancements, neighborhood sewer construction, temporary permits for street usage</li> <li>• Oregon Department of Environmental Quality (DEQ): product/waste disposal, facility enhancements</li> <li>• U.S. Environmental Protection Agency (USEPA): for Portland Harbor Superfund Site, Resource Conservation and Recovery Act (RCRA), and Toxic Substances Control Act (TSCA)</li> </ul> <p>Regarding health and safety concerns, interaction with the following agencies would occur as a result of a compliance inspection, a consultation visit or during the course of an accident investigation (contact with the OPUC would occur if an accident of a certain severity occurred at a site):</p> <ul style="list-style-type: none"> <li>• Federal Occupational Safety and Health Administration (OSHA)</li> <li>• Oregon Occupational Safety and Health Administration (OrOSHA)</li> <li>• Oregon Public Utility Commission (OPUC)</li> <li>• Oregon Department of Transportation (ODOT)</li> <li>• Oregon Department of Energy (ODOE)</li> <li>• Federal Energy Regulatory Commission (FERC)</li> </ul> <p>Please see the attached documents.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, other than the documents attached, there are no records indicating correspondence or inspections specific to the Willbridge Substation by these regulatory agencies.</p>	<p>Question 50 Attachments</p> <p>Q50_1974-08-27 New Fence Line.pdf  Q50_1977-01-03 COP_Utility Service.pdf  Q50_1982-03-19 PGE to COP_No street vacation.pdf  Q50_1982-07-13 COP Utility Meeting Invite .pdf  Q50_1982-07-16 COP_Notice of Prop. Sewer.pdf  Q50_1982-08-02 PGE to COP_Notice of Prop. Sewer.pdf  Q50_1982-10-13 COP Prop. Sewer Status Report.pdf  Q50_1983-03-22 Prop. Sewer Survey.pdf  Q50_1984-05-04 COP Prop. Sewer Status Report.pdf  Q50_1998-09-30 COP Sewer Questionairre.pdf  Q50_2000-05-12 COP Notice of Compliance.pdf  Q50_2000-08-16 PGE to COP.pdf  Q50_Willbridge 2000 COP Permit for Street Use.pdf  Q50_Willbridge 2001 COP Permit for Street Use.pdf  Q50_Willbridge 2001 Request for Reissue of COP Permit.pdf</p>

<sup>1</sup> Attachment located on the Confidential Critical Energy Infrastructure Information (CEII) CD

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51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.	<p>To the best of PGE's knowledge, after reasonable inquiry, PGE has not had any environmental related violations/citations/deficiencies for the Willbridge Substation. For spills/discharges, please see the response to Question 62.</p> <p>PGE maintains records of all OSHA accidents and injuries; however, the records are not categorized or searchable by property. To the best of PGE's knowledge, after reasonable inquiry, PGE does not know if any OSHA reportable accidents/injuries have occurred at the Willbridge Substation.</p>	
52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.	<p>The Willbridge Substation does not have any environmental permits.</p> <p>The attached documents (Q52_01.pdf and Q52_02.pdf) are general PGE disposal permits, for which specific contributions from substations are not indicated. A component of the waste disposed under these permits may have originated from the Willbridge Substation.</p> <p>See the documents (Q50_2000-08-16 PGE to COP.pdf, Q50_Willbridge 2000 COP Permit for Street Use.pdf, Q50_Willbridge 2001 COP Permit for Street Use.pdf, and Q50_Willbridge 2001 Request for Reissue of COP Permit.pdf) attached in response to Question 50 for information about temporary emergency street use permits issued by the City of Portland.</p>	<p>Question 52 Attachments Q52_01.pdf Q52_02.pdf</p> <p>Also see Question 50 Attachments Q50_2000-08-16 PGE to COP.pdf Q50_Willbridge 2000 COP Permit for Street Use.pdf Q50_Willbridge 2001 COP Permit for Street Use.pdf Q50_Willbridge 2001 Request for Reissue of COP Permit.pdf</p>
53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.	No Hazardous Waste Activity Notification was filed for the Willbridge Substation.	
54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.	Not applicable. No application for "interim status."	
55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.	To the best of PGE's knowledge, after reasonable inquiry, no RCRA Identification Number has been issued for the Willbridge Substation.	

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EPA Question	Response	Records/Information Available
<p>56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.</p>	<p>To the best of PGE's knowledge, after reasonable inquiry, no hazardous substance or hazardous waste information has been sent or filed to any federal offices for the Willbridge Substation.</p> <p>Hazardous materials from the Willbridge Substation, if any, has been disposed of after interim storage at a PGE waste and material handling facility (e.g., the PSC). See the 104(e) response for Harborton Substation, which is within the Investigation Area and was historically a PGE waste and material handling facility, and the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7).</p>	
<p>57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.</p>	<p>To the best of PGE's knowledge, after reasonable inquiry, no hazardous substance or hazardous waste information has been sent or filed to any state offices for the Willbridge Substation.</p> <p>Hazardous materials from the Willbridge Substation, if any, has been disposed of after interim storage at a PGE waste and material handling facility (e.g., the PSC). See the 104(e) response for Harborton Substation, which is within the Investigation Area and was historically a PGE waste and material handling facility, and the supplemental submittal of documentation from other PGE facilities that may have received waste and materials from the Willbridge Substation (Supplemental Submittal S7).</p>	
<p>58. List all federal and state environmental laws and regulations under which the Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each</p>	<p>The federal and state environmental laws and regulations under which PGE has reported to federal and state governments for the Willbridge Substation include the Oregon Solid Waste Law and the state fire code.</p>	

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report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.		
59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.	Annual PCB reports (1978-2007) for PGE (all PGE sites combined) are maintained in compliance with record-reporting rule 40 CFR 761 and are provided in a supplemental submittal (Supplemental Submittal S3). The 2008 annual PCB report is not included in the supplemental submittal because it has not yet been completed.	
60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, there are/were no known contacts to DSL in regards to an incident, accident, spill, release, or other event involving the Willbridge Substation.	
61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting,	Not applicable. To the best of PGE's knowledge, after reasonable inquiry, there are/were no known notices or reporting requirements to DSL for the Willbridge Substation.	

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or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.		
<b>Section 6.0 - Releases and Remediation</b>		
62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify and provide copies of any documents regarding:	<p>To the best of PGE's knowledge, after reasonable inquiry, the attached document provides information describing the known leaks, spills, or releases into the environment at the Willbridge Substation. The following summary incorporates all known and available information with respect to specific releases that have occurred at the Willbridge Substation:</p> <ul style="list-style-type: none"> <li>8 August 2005 - Approximately 1 gallon of transformer oil spilled onto gravel and concrete. PCB labeling on the transformer indicated PCB levels &lt;15 ppm. Laboratory results indicated that the oil contained PCBs at a concentration of 12 ppm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of approximately 2 cubic feet of soil and gravel).</li> </ul>	<p>Question 62 Attachment Q62_Willbridge Spill Report 8-8-05.pdf</p>
a. when such releases occurred;		
b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);		
c. the amount of each hazardous substances, pollutants, or contaminants so released;		
d. where such releases occurred;		
e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;		
f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water		

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<p>(ground and surface), or air testing undertaken;</p> <p>g. all persons with information relating to these releases; and</p> <p>h. list all local, state, or federal departments or agencies notified of the release, if applicable;</p>		
<p>63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:</p> <p>a. where the disposal system or floor drains were located;</p> <p>b. when the disposal system or floor drains were installed;</p> <p>c. whether the disposal system or floor drains were connected to pipes;</p> <p>d. where such pipes were located and emptied;</p> <p>e. when such pipes were installed;</p> <p>f. how and when such pipes were replaced. or repaired; and</p> <p>g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.</p>	<p>To the best of PGE's knowledge, after reasonable inquiry, PGE has no knowledge of waste disposal or of any spills, leaks, releases, or discharges of waste into subsurface disposal system or floor drains at the Willbridge Substation.</p>	

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64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:		
a. amount of soil excavated;	On 8 August 2005, in response to a release of transformer oil, approximately two cubic feet of soil and gravel were excavated. See the document (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62.	See Question 62 Attachment Q62_Willbridge Spill Report 8-8-05.pdf
b. location of excavation presented on a map or aerial photograph;	To the best of PGE's knowledge, after reasonable inquiry, there are no maps, photographs, or figures that depict the location of the soil and gravel removed in response to the transformer oil release on 8 August 2005.	
c. manner and place of disposal and/or storage of excavated soil;	To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate disposal documentation for the soil and gravel removal on 8 August 2005. However, based on the document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a, it is likely that the gravel and soil (< 15 ppm PCBs) was transported to a PGE waste and used material handling facility for interim storage prior to disposed of at the Hillsboro Landfill under the general disposal permits attached in response to 52.	See Question 21 Attachment Q21a_Waste Stream Summary.pdf  Also see all Question 52 Attachments
d. dates of soil excavation;	See the responses to Questions 64a, 64b, and 64c.	
e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;	To the best of PGE's knowledge, after reasonable inquiry, soil and gravel removals were performed by personnel from PGE's EM&C construction department. The PGE EM&C construction department foremen include Dan Loftin and Tim Danchok; other PGE EM&C personnel have changed over time.	
f. reason for soil excavation;	The excavation was conducted in response to an equipment spill.	
g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;	PCB labeling on the transformer indicated PCB levels <15 ppm. Laboratory results indicated that the oil contained PCBs at a concentration of 12 ppm. See the spill report (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62 for additional details.	See Question 62 Attachment Q62_Willbridge Spill Report 8-8-05.pdf
h. all analyses or tests and results of analyses of the soil that was removed from the Property;	To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate records of the analysis of soil and gravel removed as a result of the spill on 8 August 2005; however, the spill report (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62 indicates a PCB level of 12 ppm.	See Question 62 Attachment Q62_Willbridge Spill Report 8-8-05.pdf
i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and	To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate any documents indicating that soil remaining in place was tested. In general, spills are cleaned up to remove all visible contamination plus 1 foot laterally.	
j. all persons, including contractors, with information about (a) through (i) of	Multiple individuals have had authority within PGE to access and conduct activities on the Willbridge Substation. These are listed on documents attached in response to Question 6g. Also see the documents attached in response to Question 38, for PGE personnel responsible for	See Question 6 Attachments Q06g_Bullseye articles.pdf Q06g_Organizational Charts.pdf



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this request.	environmental matters from 1980 – present. To the best of PGE’s knowledge, after reasonable inquiry, soil and gravel removals were performed by personnel from PGE’s EM&C construction department. The PGE EM&C construction department foremen include Dan Loftin and Tim Danchok; other PGE EM&C personnel have changed over time.	Q06g_Distribution and System Planning Information.pdf Q06g_HRIC Structure Report 2008.pdf Q06g_HRIC Structure Info 1982-2007.pdf  Also see all Question 38 Attachments
65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.	To the best of PGE’s knowledge, after reasonable inquiry, groundwater under the Willbridge Substation has not been tested.	
66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify: a. reason for groundwater action; b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents; c. all analyses or tests and results of analyses of the groundwater; d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and e. all persons, including contractors, with information about (a) through (c) of this request.	To the best of PGE’s knowledge, after reasonable inquiry, PGE has not treated, pumped, or taken any kind of response action on groundwater under the Willbridge Substation.	
67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette	To the best of PGE’s knowledge, after reasonable inquiry, no. The Willbridge Substation is not on, over, or directly adjacent to the Willamette River and there are no over-water structures. To the best of PGE’s knowledge, after reasonable inquiry, there has never been a spill, leak,	

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<p>River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unqualified "no", identify:</p> <p>a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;</p> <p>b. the dates of each such occurrence;</p> <p>c. the amount and location of such release;</p> <p>d. were sheens on the river created by the release;</p> <p>e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.</p>	<p>release, or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river at the Willbridge Substation.</p>	
<p>68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s) or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.</p>	<p>On 8 August 2005, approximately 1 gallon of transformer oil (PCBs content &lt;15 ppm) spilled onto gravel and concrete; see the spill document (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62. Laboratory results indicated that the soil and gravel contained PCBs at a concentration of 12 ppm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of approximately 2 cubic feet of gravel and soil).</p>	<p>See Question 62 Attachment  Q62_Willbridge Spill Report 8-8-05.pdf</p>

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<p>69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release. Provide all documentation regarding, but not limited to, the following releases:</p>	<p>On 8 August 2005, approximately 1 gallon of transformer oil (PCBs content &lt;15 ppm) spilled onto gravel and concrete; see the spill document (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62. Laboratory results indicated that the oil contained PCBs at a concentration of 12 ppm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of approximately 2 cubic feet of gravel and soil).</p> <p>To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate disposal documentation for the soil and gravel removal on 8 August 2005. However, based on the document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a, it is likely that the gravel and soil (&lt; 15 ppm PCBs) was transported to a PGE waste and used material handling facility for interim storage prior to disposed of at the Hillsboro Landfill under the general disposal permits attached in response to 52.</p> <p>Also see the responses to Questions 62 and 68.</p>	<p>See Question 21 Attachment Q21a_Waste Stream Summary.pdf</p>
<p>a. a May 20, 1988 release of 20 gallons of 400 parts per million PCB transformer oil;</p>	<p>Not applicable. Questions 69a through 69e are not relevant to the Willbridge Substation. Information regarding these investigations is provided in the 104(e) response for the Harborton Substation.</p>	<p>Also see all Question 52 Attachments</p>
<p>b. a February 9, 1995 release of 5 gallons of oil that spilled from a bushing on the ground;</p>		<p>Also see Question 62 Attachment Q62_Willbridge Spill Report 8-8-05.pdf</p>
<p>c. a February 24, 1997 release of 20 gallons of 19 parts per million PCB transformer oil onto the ground, and;</p>		
<p>d. a July 25, 1997 release of 3 gallons of less than 5 parts per million PCB oil from a break on the ground, and;</p>		
<p>e. a December 4, 1997 release of 40 gallons of cable oil onto the ground following vandalism at the Harborton substation.</p>		
<p><b>Section 7.0 - Property Investigations</b></p>		

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<p>70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.</p>	<p>To the best of PGE's knowledge, after reasonable inquiry, no insurance or coverage-related health and safety inspections, evaluations, audits, or correspondence were prepared for this location.</p> <p>The attached documents relate to general fire, flood, wind and, earthquake inspections. An engineer from PGE's office of Facilities Management (FM) conducts several inspections a year at most PGE locations. The engineer will do a complete walk through each facility looking for fire hazards and will issue a recommendation when a problem is found. Along with these inspections, the fire protection systems and equipment are checked and usually functionally tested. There are locations that are inspected by FM which do not require the issuing of an inspection report. These locations are small substations where there are only pressure vessels located on the system circuit breakers. This inspection is required by the State of Oregon. Following the inspection, the inspector will send his report to the State so they can keep up to date on the condition of PGE pressure vessels.</p> <p>Copies of PGE's relevant general liability insurance policies are provided in a supplemental submittal (Supplemental Submittal S4).</p>	<p>Question 70 Attachment Q70_FM Global Substation Review.pdf</p>
<p>71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.</p>	<p>Soil characterization sampling was conducted in October 1996. Four composite soil samples were collected and tested for PCB content. Laboratory results indicated no detectable concentrations of PCBs; see the document (Q15_Soil Data 10-31-1996.pdf) attached in response to Question 15.</p> <p>On 8 August 2005, in response to a release of transformer oil, approximately two cubic feet of soil and gravel were excavated. See the document (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62.</p> <p>The Willbridge SPCC Plan (Q19_Willbridge_SPCC_Aug_22_2008.pdf), attached in response to Question 19, briefly discusses topography and soil condition at the Willbridge Substation.</p> <p>To the best of PGE's knowledge, after reasonable inquiry, the attached documents include all the investigations PGE was able to locate for the Willbridge Substation related to soil, water (ground and surface), or air quality and geology/hydrogeology.</p>	<p>See Question 15 Attachment Q15_Soil Data 10-31-1996.pdf</p> <p>Also see Question 19 Attachment Q19_Willbridge_SPCC_Aug_22_2008.pdf</p> <p>Also see Question 62 Attachment Q62_Willbridge Spill Report 8-8-05.pdf</p>
<p>a. a May 20, 1988 release of 20 gallons of 400 parts per million PCB transformer oil;</p> <p>b. a February 9, 1995 release of 5 gallons of oil that spilled from a bushing on the ground;</p> <p>c. a February 24, 1997 release of 20 gallons of 19 parts per million PCB transformer oil onto the ground, and;</p>	<p>Not applicable. Questions 71a through 71e are not relevant to the Willbridge Substation. Information regarding these investigations is provided in the response for the Harborton Substation.</p>	

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<p>d. a July 25, 1997 release of 3 gallons of less than 5 parts per million PCB oil from a break on the ground, and;</p> <p>e. a December 4, 1997 release of 40 gallons of cable oil onto the ground following vandalism at the Harborton substation.</p>		
<p>72. Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.</p>	<p>To the best of PGE's knowledge, after reasonable inquiry, the following presents a summary of known remedial activities at the site:</p> <p>On 8 August 2005, in response to a release of transformer oil, approximately two cubic feet of gravel and soil were removed from Willbridge Substation. See the document (Q62_Willbridge Spill Report 8-8-05.pdf) attached in response to Question 62. PCB labeling on the transformer indicated PCB levels &lt;15 ppm. Laboratory results indicated that the oil contained PCBs at a concentration of 12 ppm. The spill was reported to the PGE System Control Center, contained, and cleaned up (including the removal and disposal of approximately 2 cubic feet of gravel and soil).</p> <p>To the best of PGE's knowledge, after reasonable inquiry, PGE was unable to locate disposal documentation for the soil and gravel removal on 8 August 2005. However, based on the document (Q21a_Waste Stream Summary.pdf) attached in response to Question 21a, it is likely that the gravel and soil (&lt; 15 ppm PCBs) was transported to a PGE waste and used material handling facility for interim storage prior to disposed of at the Hillsboro Landfill under the general disposal permits attached in response to 52.</p>	<p>See Question 21 Attachment Q21a_Waste Stream Summary.pdf</p> <p>Also see all Question 52 Attachments</p> <p>Also see Question 62 Attachment Q62_Willbridge Spill Report 8-8-05.pdf</p>
<p>73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, and hydrology or air quality on or about the Property? If so, identify:</p> <p>a. what the nature and scope of these investigations will be;</p> <p>b. the contractors or other persons that will undertake these investigations;</p> <p>c. the purpose of the investigations;</p>	<p>No future investigations for this site are planned. Soil confirmation sampling may be conducted in the future, after cleanup of small spill events and general operational activities (e.g., removal, updates, maintenance) on an as needed basis.</p>	

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d. the dates when such investigations will take place and be completed; and		
e. where on the Property such investigations will take place.		
<b>Section 8.0 - Corporate Information</b>		
74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:	Responses and documents for Section 8.0 – Corporate Information for all PGE sites are provided in a supplemental submittal (Supplemental Submittal S1).	
a. state the current legal ownership structure (e.g., corporation, sole proprietorship);		
b. state the names and current addresses of all current and past owners of the business entity or, if a corporation, current and past officers and directors;		
c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;		
d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each		

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such identified business entities or subsidiaries; and		
e. if your- business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.		
75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:		
a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;		
b. names, addresses, and telephone numbers of all registered agents, officers and operations management personnel; and		
c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.		
d. all information requested in (a) through (c) above regarding, but not limited to, the following entities and including their relationship to Respondent (e.g. whether these entities are business partners, separate entities, subsidiaries, and/or		

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aliases etc. of Respondent):		
i. V & K Service, Inc.; and		
ii. Jinkz Corp.		
76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.		
77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:		
a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;		
b. the dates such relationship existed;		
c. the percentage of ownership of Respondent that is held by such other entity(ies);		
d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five		



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<p>percent of that affiliated entity's stock;</p> <p>e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and</p> <p>f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.</p> <p>g. all information requested in (a) through (f) above regarding, if applicable, but also explain any corporate or financial relationship Respondent may have had or has with the Enron Corporation.</p>		
<p>78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.</p>		
<p><b>Section 9.0 - Compliance With This Request</b></p>		
<p>79. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:</p>		

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a. the name and current job title of all individuals consulted;	<p>Ron Parr, Facility Management Supervisor                      Bob Millican, Facility Management Specialist                      Randy Nicolay, Facility Management Specialist                      Dave VanBossuyt; Distribution Administration Manager                      Mark Cooksey, IT Client Services Manager                      Laura Holgate, Power Supply Eng Services Supervisor                      Jeddy Beasley, Transportation Services Manager                      Jayne Allen, Environmental Services Specialist                      Arya Behbehani-Divers, Environmental Services Manager                      Brandy Horn, Environmental Services Specialist                      Mike Livingston, Property Services Manager                      Tim Calhoun, Network Communications Supervisor – retired                      Mike Schwartz, Power Supply Eng Services General Manager                      Rand Sherwood, Utility Services Manager                      Tom Stodd, Environmental Services Specialist                      Bob Lazrine Special Tester Forman                      Sid Hiller – Manager                      Kristina Rodgers – Assistant                      Debby Klinger – Specialist                      Chuck McCartney – Specialist                      Alma McGloghlon – Analyst                      Larry Morgan – Supervisor                      Gwen Williams - Manager</p> <p>In addition, the attached document contains additional sources consulted for responses to selected questions.</p>	Question 79 Attachment Q79a_PdxHarbor Contact Information Rev.pdf
b. the location where all sources reviewed are currently reside; and	<p>PGE's Office at: 121 SW Salmon, 1WTC1302, Portland, Oregon 97204. Records are contained in the Facilities Management Departments, the Human Resources Department, and in the Corporate Records Information System (CRIS) database.</p> <p>In addition, the Hawthorne Retiree Museum contains the following:</p> <ul style="list-style-type: none"> <li>• The History of Portland General Electric Company, 1889 - 1981</li> <li>• <u>Electrifying Eden</u> by Craig Wollner</li> </ul> <p>The History of Portland General Electric Company, 1989 - 1981 is attached in response to Question 77, which is part of the Supplemental Submittal S1.                      A hardcopy of <u>Electrifying Eden</u> is provided in a separate submittal.</p>	
c. the date consulted.	Work on this information request was performed from February 2008 through April 2009.	

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EPA Question	Response	Records/Information Available
80. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous substances, waste, or materials to or from each Property identified in response to Question 4.	The Willbridge Substation is an unmanned substation, requiring only periodic maintenance and monthly inspections. See the responses and documents for Questions 2, 6g, 21, 38, 40, and 79.	<p>See Question 6 Attachments  Q06g_Bullseye articles.pdf  Q06g_Organizational Charts.pdf  Q06g_Distribution and System Planning Information.pdf  Q06g_HRIC Structure Report 2008.pdf  Q06g_HRIC Structure Info 1982-2007.pdf</p> <p>Also see all Question 21 Attachments</p> <p>Also see all Question 38 Attachments</p> <p>Also see Question 40 Attachment  Q40_Waste-Materials Receivers and Carriers.pdf</p> <p>Also see Question 79 Attachment  Q79_PdxHarbor Contact Information Rev.pdf</p>
81. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:	<p>PGE Records Management Services (RMS) provides a uniform records management program for the company. The program includes the Corporate Records Information System (CRIS) an online application used by departments to identify, index and manage their records. RMS also provides records storage and retrieval and document imaging services.</p> <p>RMS can investigate why records are no longer available if we know which records are being sought. Knowing the date, originator and subject of the records in question are essential to determine their availability or their ultimate disposition.</p> <p>Each unique record category is identified in CRIS and assigned a file pattern code (file category). Information about each file category includes the office of record (originator), and retention requirements and regulatory citations – who requires the record to be kept and for how long. The PGE records program and records retention schedule comply with the recordkeeping requirements of the Oregon Public Utility Commission (PUC) and Federal Energy Regulatory Commission (FERC).</p> <p>State and federal guidelines require us to identify which records PGE produces and how and for how long those records will be retained. PGE Policy requires that records should not be destroyed before, or kept after, meeting retention requirements. Consequently, PGE regularly destroys records in the normal course of business, and when legally required to do so. Such destructions are approved by the PGE Records Retention Committee and authenticated and recorded by RMS.</p> <p>How long a particular type of record is retained is based on operating needs, legal and regulatory requirements and, in a few cases, historical or archival value.</p>	
a. the document retention policy	RMS was created in 1977 and we can provide PGE's records management guidelines from 1977	

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between 1937 and the present;	to the present. Prior to that time records management was the responsibility of each functional area, plant or division office. Accounting records were kept in compliance with 18 CFR Part 125, Regulations to Govern the Preservation of Records of Public Utilities and Licensees (1972), issued by the Federal Power Commission (now FERC) and NARUC, the Nat'l Assoc. of Regulatory Utility Commissioners.	
b. the approximate date of destruction;	See the response to Question 81a, above. Since it was established (c. 1977) RMS has maintained a hardcopy or microfilm record of boxes of records destroyed in the normal course of business, if those records were turned over to RMS custodianship. To know <i>when</i> a record was destroyed, it is necessary to know the record category, the approximate date of creation, and which department created it. It should be noted that the level of detail of information about the records destroyed is the same as that used to identify the records when they were sent to storage.	
c. a description of the type of information that would have been contained in the documents;	See the response to Question 81b, above. RMS can help discern what records were typically filed in a particular file category. If similar records from that era exist they may show what information was captured by the documents. For example, a typical "job" form from 1980 would include much the same information listed on a similar job form from 1940, i.e., the work location, equipment used, labor hours, parts, drawings, etc.	
d. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for destroying the documents; and the person(s) who had and/or still have the originals or copies of these documents; and	RMS is responsible for all records sent to the records center from 1977 to present, including ultimate disposition of those records. Records of documents destroyed include the names of the originator, authorizations for destruction (signatures) and the name of the person who physically destroyed or recycled the documents. Individual Responsibility Center (RC) managers are and would have been responsible for maintaining and disposing all other records, i.e., those that were not sent to the archives.	
e. the names and most current addresses of any person(s) who may possess documents relevant to this inquiry.	<p>RMS can provide printed reports from the CRIS of existing records related to the request (that have been entered into CRIS by the originating RC). CRIS shows the names of all departments using the system for managing their records, what categories of records are maintained and where the records are filed (in the department or the records storage center).</p> <p>On request, RMS can provide a list of all RCs that use the CRIS system. This report would show each RC's file plan by document type (or subject) and the types of documents that should be filed under those headings.</p>	
82. Provide a description of all records available to you that relate to all of the questions in this request, but which have	Multiple key word searches were performed in PGE's CRIS system. No date restrictions were placed on the searches. The results from each key word search were printed from the CRIS system with either a list of record titles or a "There are no entities to display" message. The "There are no entities to display" message means that based on the search query no records	

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not been included in your responses.	<p>were found. Individual CRIS printouts are available upon request but provide no additional information.</p> <p>Documents not included in this request include:</p> <ul style="list-style-type: none"><li>• Documents describing other PGE sites</li><li>• PGE internal emails, correspondences, documents not specifically relevant to these questions</li><li>• Documents determined to be Attorney-Client privileged, which are identified on the comprehensive privilege log that will be submitted with the final set of responses.</li><li>• Duplicate documents/figures</li><li>• Two General Information Documents – Theory on Sand Berms and Theory on Oil Spill Containment Products</li><li>• Database of OSHA reportable accidents/injuries for PGE properties in Oregon</li></ul>	